

Caramadre textmap**Bradshaw, Leon 12.1.09 video depo****Full-size Transcript****Prepared by:**

DOJ-USARI

Thursday, February 23, 2012

00001:01 UNITED STATES DISTRICT COURT
 02 FOR THE DISTRICT OF RHODE ISLAND
 03
 04
 05 IN RE: GRAND JURY PROCEEDINGS
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 12 Videotaped deposition of LEON BRADSHAW,
 13 a Witness herein, taken on behalf of the United
 14 States Attorney, on TUESDAY, DECEMBER 1, 2009, at
 15 700 Westminster Street, Providence, Rhode Island,
 16 scheduled at 1:00 p.m., before Diane J. DeStefano,
 17 Registered Professional Reporter, a Notary Public in
 18 and for the State of Rhode Island.
 19
 20
 21
 22
 23 Vivian S. Dafoulas & Associates
 24 50 Fieldstone Drive
 25 East Greenwich, RI 02818

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 25
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BY: ROBERT G. FLANDERS, JR., ESQUIRE
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 21 ALSO PRESENT: RAYMOUR RADHAKRISHNAN
 22 JOSEPH CARAMADRE
 23 STEPHEN E. SOUZA, POSTAL INSPECTOR
 24 VIDEOGRAPHER: LARRY HOLMES, NATIONAL VIDEO REPORTERS
 25
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17	Leon Bradshaw dated 8/4/2008 21
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19	2 Photocopy of \$4,000 check payable to
20	Leon Bradshaw dated 9/2/2008 25
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00005:01 TUESDAY, DECEMBER 1, 2009, 1:06 P.M.

02 THE VIDEOGRAPHER: We are now recording and

03 on the record. My name is Larry Holmes. I am a

04 legal video specialist for National Video Reporters,

05 Incorporated. Our business address is 7 Cedar Drive,

06 Woburn, Mass., 01801

07 Today's date is December 1st, 2009, and the

08 time is 1:06 p.m. This is the deposition of Leon

09 Bradshaw in the matter of In Re: Grand Jury

10 Proceedings. This deposition is being taken at 700

11 Westminster Street, in Providence, Rhode Island. The

12 court reporter is Diane DeStefano of Vivian Dafoulas

13 & Associates. Counsel will state their appearances

14 and the court reporter will administer the oath.

15 MR. VILKER: Okay. This is Lee Vilker,

16 Assistant United States Attorney for the Government.

17 MR. McADAMS: John McAdams, Assistant

18 United States Attorney for the Government.

19 MR. PINE: Jeffrey Pine for Raymour

20 Radhakrishnan.

21 MR. RADHAKRISHNAN: Raymour Radhakrishnan.

22 MR. FLANDERS: Robert Flanders for Joseph

23 Caramadre.

24 MR. CARAMADRE: Joseph Caramadre.

25 MR. MacFADYEN: John MacFadyen

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00006:01

02 MR. TRAINI: Anthony Traini

03

04 MR. SOUZA: And I'm Stephen Souza, Postal

05 Inspector.

06 LEON BRADSHAW,

07 called as a witness and having first been duly

08 sworn, testifies as follows:

09 THE REPORTER: Please state your full name

10 for the record.

11 THE WITNESS: Leon Bradshaw.

12 MR. TRAINI: Mr. Vilker.

13 MR. VILKER: Yes.

14 MR. TRAINI: Before you get started, if we

15 could just put on record our objections that we've

16 made in the past to the deposition. The initial

17 objections are the ones that are contained in the

18 written objection document that we have filed with

19 each of the depositions up to now, and I have another

20 copy of that to give to Ms. DeStefano to mark as an

21 exhibit to the transcript.

22 (Defendants' Exhibit A was marked for

23 identification.)

24 In addition to the objections that are

25 stated, we reiterate all of the objections that we've

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00007:01 made on the record at each of the previous
 02 depositions, including without limitation the
 03 standing Petrozziello objection so that we do not
 04 have to inconvenience the deponent or unnecessarily
 05 delay the deposition by objecting to each and every
 06 question on Petrozziello grounds.
 07 And also I believe we had a -- an agreement
 08 that an objection by one counsel is an objection for
 09 all counsel, and we reiterate all of those positions
 10 and incorporate by reference any other objections we
 11 made from the records of the previous depositions.
 12 MR. MacFADYEN: And I would -- sorry. [REDACTED]
 13 [REDACTED] John MacFadyen. I would also like
 14 just to state for the record that it is our position
 15 that we can reserve substantive objections to the
 16 time when this deposition might be later used. I
 17 appreciate the Government takes issue with that
 18 particular position, but it is the position we have
 19 asserted throughout these depositions.
 20 MR. VILKER: Okay. I'm Lee Vilker for the
 21 Government. I don't think we need to belabor this
 22 discussion much more. The Government incorporates
 23 its responses to the objections raised by counsel in
 24 this case, incorporates our responses made in the
 25 previous four depositions.

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00008:01 We are agreeable that an objection for one
 02 counsel will serve as an objection for -- for all.
 03 Again, it is our position that an objection needs to
 04 be raised for it to be preserved and the parties have
 05 agreed to disagree on that point for now. Okay. Is
 06 everybody okay? Are we ready to proceed? Okay.
 07 EXAMINATION
 08 BY MR. VILKER:
 09 Q. Good afternoon, Mr. Bradshaw. My name is
 10 Lee Vilker. I'm an Assistant United States Attorney
 11 and I'll be asking you questions first on behalf of
 12 the Government. First, you understand that you've
 13 been put under oath today and are -- have sworn to
 14 tell truth, the whole truth, and nothing but the
 15 truth?
 16 A. Yeah.
 17 Q. Okay. Now, how -- how old are you,
 18 Mr. Bradshaw?
 19 A. Seventy-three.
 20 Q. Okay. And where were you born?
 21 A. Richmond, Virginia.
 22 Q. And how long did you live in Virginia?
 23 A. Um, wow. Let's see, this is -- I guess I
 24 would say about 18 years I guess.
 25 Q. Okay.

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00009:01 A. No, wait a minute. When I went in the
 02 service, I was 18 years old. Yeah, about 18 years,
 03 yeah.
 04 Q. Okay. And did there come a point in time
 05 when you moved to Rhode Island?
 06 A. Yeah. That was a long time after that
 07 though.
 08 Q. Okay. Well, just when generally did you
 09 -- did you move to Rhode Island then?
 10 A. Rhode Island, December 27th, 1974.
 11 Q. Okay.
 12 A. Wait a minute. Wrong. '77.
 13 Q. Okay. And are you retired now?
 14 A. Yeah.
 15 Q. Okay. How long have you been retired?
 16 A. 62.
 17 Q. Since you were 62 years old?
 18 A. Yeah.
 19 Q. Okay. So about 11 years?
 20 A. Yes.
 21 Q. What did you do for your career?
 22 A. Well, I'm a certified alcohol counselor.
 23 Q. Okay. And where did you work?
 24 A. Well, I worked here, I worked in
 25 Connecticut and here, yeah.

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00010:01 Q. Okay. You helped people that were dealing
 02 with alcohol abuse?
 03 A. Yeah. Well, I set up programs and I ran
 04 programs.
 05 Q. Okay. Now, I want to ask you some
 06 questions about your health. Was there a time that
 07 -- that you -- that you learned that you had cancer?
 08 A. A time that I learned that I had cancer?
 09 Q. Yes. Well, did -- was there a time that
 10 you had cancer?
 11 A. Well, when I learned I had cancer, I had
 12 the tumor in Rhode Island when I went to the
 13 hospital.
 14 Q. And did you get treatment for -- for that
 15 tumor?
 16 A. Yeah, yeah.
 17 Q. Okay. And what's the state of -- of your
 18 cancer now? Are you -- are you --
 19 A. Well, as far as I know, as far as I know,
 20 I'm supposed to be cancer free.
 21 Q. Okay.
 22 A. Okay? And they're dealing with my lungs.
 23 That's as far as I know, okay?
 24 Q. Okay. And what's the -- you mentioned
 25 your lungs. What's the condition of your lungs?

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1 00011:01 A. Well, I've got -- I've just got bad lungs,
2 02 man, you know. I can't -- I can't get into a lot of
3 03 doctor's terms. They've got all kinds of terms. I
4 04 don't know. My lungs is bad, that's all.
5 05 Q. Okay.
6 06 A. You know, it's breathing, my breathing.
7 07 I'm just bad. They're just bad.
8 08 Q. Okay. And do you -- you're on oxygen now?
9 09 A. Yeah, all the time. Yeah.
10 10 Q. Okay. And you need the oxygen to help you
11 11 breathe?
12 12 A. I need it all the time, yeah.
13 13 Q. Okay.
14 14 A. 24 hours.
15 15 Q. Okay. Now, are you on any medications at
16 16 all now that affect your ability to understand the
17 17 questions that I'm asking?
18 18 A. No. I'm under medication but I understand
19 19 what you're saying.
20 20 Q. Okay.
21 21 A. I think so, if you put them in the right
22 22 words.
23 23 Q. Okay. Well, if at any point I ask a
24 24 question that you're not sure I'm asking --
25 25 A. I'm gonna -- yeah, I'll ask you.

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1 00012:01 Q. Yeah.
2 02 A. I don't have no point in asking you
3 03 nothing.
4 04 Q. Ask me and I'll repeat it.
5 05 A. Yeah.
6 06 Q. Okay. Now, at one point did you have a
7 07 nurse that was named Cathy?
8 08 A. I've got a nurse that's named Cathy now.
9 09 Q. Okay. She's still your nurse now?
10 10 A. Yeah, if you're talking about the one that
11 11 comes to see me.
12 12 Q. Okay. How often does Cathy come to see
13 13 you?
14 14 A. Oh, man. Cathy -- I don't know. Two,
15 15 three times a month maybe.
16 16 Q. Okay.
17 17 A. You know. She comes anytime I need it.
18 18 Q. Okay.
19 19 A. All I gotta do is call up.
20 20 Q. Okay. And was Cathy coming to see you
21 21 back in the middle of 2008, last year?
22 22 A. I would think so, yeah.
23 23 Q. Okay.
24 24 A. I think so, yeah.
25 25 Q. Okay. And did she come here to visit you

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1 00013:01 in your apartment?
2 02 A. Yeah.
3 03 Q. Okay. Now, did there come a point in time
4 04 in which Cathy spoke to you about a way in which you
5 05 could make some money?
6 06 A. Well, the way you put that, that's not --
7 07 that's not the way she came to me.
8 08 Q. Okay. Well, what did she say to you?
9 09 A. Not the way you put it.
10 10 Q. What did she say to you?
11 11 A. If I can remember correctly, and I hope
12 12 I'm right, you know, she said to me about -- how did
13 13 she say it -- about, you know, people -- people like
14 14 me, meaning in my condition I guess, I don't know,
15 15 they was -- somebody was giving away money. I mean
16 16 that's just the way it was, somebody was giving away
17 17 money.
18 18 Q. Okay.
19 19 A. And, you know, she was gonna look into it
20 20 for me and that's what happened.
21 21 Q. Were you interested in this when she first
22 22 told you about it?
23 23 A. If they're gonna give me money, yeah, I'm
24 24 interested. If you say you're gonna give me money
25 25 I'm interested, yeah, right here now, yeah.

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1 00014:01 Q. Okay. Did you -- did you -- did you place
2 02 any phone calls after she told you about it or did
3 03 Cathy?
4 04 A. No. I didn't place nothing, no.
5 05 Q. Okay. Was there a time after you had this
6 06 conversation with Cathy in which you spoke to
7 07 somebody on the phone about -- about the possibility
8 08 of you getting some money?
9 09 A. Not about the possibility of me getting
10 10 some money, no, no. I remember speaking to -- I
11 11 think it's Raymour. I spoke to him on the phone,
12 12 yeah.
13 13 Q. Okay. And what do you -- what do you
14 14 remember Raymour saying to you on the phone?
15 15 A. It wasn't about getting no money.
16 16 Q. Well, what do you remember him saying
17 17 then?
18 18 A. He just wanted to see me. He wanted to
19 19 see me.
20 20 Q. Okay. And did he -- did -- did you end up
21 21 meeting with Raymour?
22 22 A. He came to my house, yeah.
23 23 Q. Okay. And this is your apartment here in
24 24 Providence?
25 25 A. Right here, yeah.

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1 00015:01 Q. Okay. And -- and you -- you pointed to a
2 02 man named Raymour. Do you see that person here
3 03 today?
4 04 A. Yeah. I see the guy right there, yeah.
5 05 Q. Okay. That's --
6 06 A. Yeah. I know, yeah.
7 07 Q. And that's the man that you met with?
8 08 A. He came to my house, yeah.
9 09 MR. VILKER: Okay. Now -- and just let the
10 10 record please reflect that the witness has identified
11 11 Mr. Radhakrishnan.
12 12 Q. Now, when Raymour got to your house that
13 13 first time what, if anything, did he say to you?
14 14 A. Oh, man.
15 15 Q. That you can remember.
16 16 A. I'm going to tell you something and I'm
17 17 being honest with you, man, that's gonna be hard to
18 18 do. Like I'm sitting here talking to you --
19 19 Q. Uh-hum.
20 20 A. -- and when I see you about an hour from
21 21 now, I don't even know what you said to me.
22 22 Q. Okay.
23 23 A. And that's the truth, you know. He said
24 24 so many things. I couldn't even actually repeat one
25 25 thing. It would be luck if I said anything to you

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1 00016:01 what he said.
2 02 Q. Okay. Well, let me ask you some more
3 03 direct questions then. What, if anything, did
4 04 Raymour say to you about any money that you could
5 05 receive?
6 06 THE WITNESS: Giving me money?
7 07 MR. VILKER: Yes.
8 08 A. No, he didn't come to me like that.
9 09 Q. Okay. Well, what did he say about any
10 10 money that you could get?
11 11 A. I don't know how he said money. He said
12 12 -- I don't know. Here's the impression I got, okay?
13 13 Now, here's the impression I got when he left, when
14 14 he left me, right? The impression I got -- now, I
15 15 this will probably figure out what he said to me, I
16 16 don't know, but the impression I got from him was
17 17 that there was some rich guy who was giving away
18 18 money to people like me and I was entitled to some
19 19 of it.
20 20 Q. Okay.
21 21 A. And that there were other people that were
22 22 like -- I don't know how many other people, and that
23 23 I was the last one that -- to get in on this thing,
24 24 whatever it is.
25 25 Q. Okay.

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1 00017:01 A. That's the impression he gave me.
2 02 Q. Okay.
3 03 A. Now -- now, the exact words he came to me,
4 04 yes, I remember money, yes, yeah, because that's all
5 05 I'm interested in. You say money to me, I -- I done
6 06 forgot everything else you said.
7 07 Q. All right.
8 08 A. That's the way it is, you know what I
9 09 mean?
10 10 Q. Okay.
11 11 A. And -- and -- and -- and -- and yes.
12 12 Q. Okay.
13 13 A. That's what it is.
14 14 Q. Did -- did Raymour, during that first
15 15 meeting, say anything to you about the amount of
16 16 money that you would get?
17 17 A. No. Not really, no.
18 18 Q. Okay. Did he say anything about rounding
19 19 the money or how he would calculate how much money
20 20 you would get?
21 21 A. Well, the -- the -- the -- the -- the
22 22 thing of rounding out a round figure, yeah, once it
23 23 had got to -- to what he was giving me at the end,
24 24 and he made a thing of rounding out a figure or
25 25 something like that, but that was after the money,

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1 00018:01 the check and all that kind of stuff.
2 02 Q. Okay.
3 03 A. You know, that wasn't before that.
4 04 Q. Okay. So during that first meeting with
5 05 Raymour, did you get any money that time?
6 06 A. No.
7 07 Q. Okay. Was there a time that Raymour paid
8 08 you another visit in your apartment?
9 09 A. Yeah.
10 10 Q. Okay. And do you know about how much time
11 11 had passed between that first visit and the second
12 12 visit?
13 13 A. Oh, wow, man. My buddies know, I don't.
14 14 And I'm guessing this, all right?
15 15 Q. Okay.
16 16 A. I'm guessing this and I -- I don't know.
17 17 Wow, man. I don't really know, man, but I'll tell
18 18 you what, I'm gonna say -- I gonna say it was maybe
19 19 three or four weeks.
20 20 Q. Okay.
21 21 A. I'm just gonna say that. That -- that
22 22 could be far from the truth --
23 23 Q. Okay.
24 24 A. -- all right?
25 25 Q. That's your best memory as you sit here?

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1 00019:01 A. Yeah, because that -- I -- I can't say
2 02 that I'd bet my life on it because I don't know.
3 03 Q. Okay. Now, do you know how the second
4 04 meeting came about, who set it up?
5 05 A. Who set it up. That's a good question.
6 06 Wow. I don't know. Did Cathy say something to me
7 07 about -- about -- I don't know. Cathy could have
8 08 said something to me --
9 09 Q. Okay.
10 10 A. -- about it but he called me and said will
11 11 you see me, I guess. I don't know.
12 12 Q. Okay.
13 13 A. You know, you know, these questions, man,
14 14 are something when you ask me. You see my mind is
15 15 money. See that's all I could see is money, you
16 16 know what I mean? And when you ask me questions
17 17 like that, see, see, because these people I'm
18 18 dealing with, I got no reason to think nothing about
19 19 these people.
20 20 Q. Right.
21 21 A. You see what I mean? Here's my nurse,
22 22 here's -- you know what I mean? What do I need to
23 23 think about them for?
24 24 Q. Okay.
25 25 A. You got some money to give me, give it to

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1 00020:01 me.
2 02 Q. Okay.
3 03 A. Just like you sitting right here now, I
4 04 got no reason to think nothing about you. You put
5 05 some money on the table, I'm gonna take it.
6 06 Q. Okay.
7 07 A. I got no reason at all --
8 08 Q. Okay.
9 09 A. -- you know? And that's the way it was
10 10 with him, you know? Yes, he might have -- he said a
11 11 lot of things that went right over my head.
12 12 Q. Okay. Now --
13 13 A. You know.
14 14 Q. -- did you -- during that second visit
15 15 with -- with Raymour, did he give you any money on
16 16 that occasion?
17 17 A. Well, no, he didn't give it to me, he -- I
18 18 think he -- I think he told me --
19 19 Q. Okay.
20 20 A. -- what it was and what this was.
21 21 Q. Okay. Well, let me show --
22 22 A. I don't know if he had a check then or
23 23 not. I forget.
24 24 Q. All right. Well, let me show you what I
25 25 have marked as Government Exhibit 1 and ask you to

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1 00021:01 take a look at it.
2 02 A. That looks good.
3 03 Q. Okay. Is that a check to you in the
4 04 amount of \$2,000?
5 05 A. Yeah, yeah.
6 06 Q. Okay. And do -- do you recall Raymour
7 07 giving you this check?
8 08 A. Yeah.
9 09 Q. Yes?
10 10 A. Yeah. Yeah, it looks like it. I don't
11 11 know if that was it or not. It looks like it.
12 12 Q. Okay.
13 13 A. It fools me. At this point it would.
14 14 Q. Okay. Well, you did get a \$2,000 check
15 15 from him?
16 16 A. Yeah, yeah.
17 17 Q. What did you do with the check after you
18 18 received it?
19 19 A. What did I do with it? Citizens Bank. I
20 20 went and I cashed it.
21 21 Q. Okay. Now, what, if anything, did Raymour
22 22 say to you when he gave you this check as to what
23 23 you were receiving this money for?
24 24 A. Man, if he said something to me, I didn't
25 25 hear it.

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1 00022:01 Q. Okay.
2 02 A. All right? And I'm not saying he didn't
3 03 say nothing, and I'm not saying he did, because I
4 04 didn't hear it. All I seen was \$2,000. That's what
5 05 I seen. That's all I cared about.
6 06 Q. Okay. What was your understanding then of
7 07 why you were receiving this money?
8 08 A. My understanding was some rich guy had
9 09 left some money for some people that was on the way
10 10 out, and I figured I was one of them people on the
11 11 way out, you know --
12 12 Q. Okay.
13 13 A. -- because they had brought me back, all
14 14 right? And so, you know, this guy was giving us
15 15 money, that's all.
16 16 Q. Okay.
17 17 A. Because -- because it was said there by
18 18 somebody that I was on the end of it. I was the
19 19 last one.
20 20 Q. Okay.
21 21 A. You know what I mean? I just got in on
22 22 it. There was some more people. I don't know about
23 23 them, you know.
24 24 Q. Okay. Now, did -- did Raymour ever
25 25 mention the name to you of Joseph Caramadre?

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1 00023:01 A. I heard that name, yeah. He came. He
 2 02 came -- he came around me, yeah.
 3 03 Q. Okay. And what do you remember him
 4 04 saying?
 5 05 A. What it was, you know, again, man, you
 6 06 know, I could care less about Caramadre. I don't
 7 07 know nothing about Caramadre. He's telling me all
 8 08 this. That's all I care about is right there.
 9 09 Q. Okay.
 10 10 A. You know what I mean? Now -- now, you
 11 11 know, I don't know what, you know. As far as I'm
 12 12 concerned, he could have been the guy who was giving
 13 13 the money away.
 14 14 Q. Okay. You're not sure then --
 15 15 A. No.
 16 16 Q. -- what exactly Raymour said about Joseph
 17 17 Caramadre?
 18 18 A. I can't tell you something that I'd have
 19 19 to make up.
 20 20 Q. Okay. No, we just want you to tell
 21 21 whatever you remember.
 22 22 A. Yeah. I've heard the name, yeah.
 23 23 Q. Okay.
 24 24 A. Yes. The name was mentioned, yeah.
 25 25 Q. Okay.

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1 00024:01 A. You know, he could have been the guy who
 2 02 was giving the money away.
 3 03 Q. Okay.
 4 04 A. I don't know, you know.
 5 05 Q. Okay. Now, after the time that Raymour
 6 06 gave you this \$2,000 check --
 7 07 A. Right.
 8 08 Q. -- the second time --
 9 09 A. Right.
 10 10 Q. -- that you met with him, did he come to
 11 11 your -- your apartment again?
 12 12 A. Well, now the next time he came was about
 13 13 the \$4,000.
 14 14 Q. Okay. And he -- the next time he came he
 15 15 gave you another \$4,000?
 16 16 A. Not another, the first one.
 17 17 Q. Okay. But he gave you \$2,000 and then --
 18 18 A. Yeah.
 19 19 Q. -- he gave you \$4,000?
 20 20 A. Yeah, yeah.
 21 21 Q. So just to be clear, the total amount that
 22 22 you received was \$6,000?
 23 23 A. \$6,000, yeah.
 24 24 Q. Okay. Now, I would like to show you
 25 25 Government Exhibit 2. Does this look like the

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1 00025:01 \$4,000 check that you received?
 2 02 A. It looks like it, yeah.
 3 03 Q. Okay. And Raymour gave you this check on
 4 04 the third meeting you had with him?
 5 05 A. Let's see. One, two, yeah, I guess you
 6 06 could say it was the third, yeah, the third meeting.
 7 07 Q. Okay. Now, do you see on the memo line of
 8 08 this check --
 9 09 A. Yeah.
 10 10 Q. -- how it's written "New" and then
 11 11 abbreviation for "Accounts"?
 12 12 A. Yeah.
 13 13 Q. And then "Setup" right here?
 14 14 A. Yeah.
 15 15 Q. Okay. Did you -- did you notice those
 16 16 words when you got this check?
 17 17 A. Yeah, see that's what I'm trying to say to
 18 18 you, you know what I mean? Like I know this is
 19 19 gonna sound stupid, man, but all I see on this check
 20 20 is \$2,000, \$4,000, Citizens Bank that I can cash it.
 21 21 And I mean I could care less about anything else on
 22 22 there.
 23 23 Q. Okay. So --
 24 24 A. I'm telling you like it is. I know it
 25 25 sounds stupid.

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1 00026:01 Q. Right. You --
 2 02 A. You know what I mean? I mean maybe if I
 3 03 was a rich guy, a businessman or something like
 4 04 that, if I was in the business, maybe I wouldn't be
 5 05 doing this.
 6 06 Q. Right.
 7 07 A. But I'm interested in that.
 8 08 Q. Okay.
 9 09 A. That's what I'm interesting in, where I
 10 10 could cash it and get the money.
 11 11 Q. Okay. So --
 12 12 A. I could care less about anything else.
 13 13 Q. So do you recall one way or the other
 14 14 whether you even noticed --
 15 15 A. Don't even --
 16 16 Q. -- those words?
 17 17 A. Well, I gotta see it, I gotta see it, but
 18 18 it -- it don't register.
 19 19 Q. Okay.
 20 20 A. You know, I gotta see it. It's impossible
 21 21 for me not to see it.
 22 22 Q. Okay.
 23 23 A. But it just don't register, you know what
 24 24 I mean?
 25 25 Q. Did -- did you ever ask Raymour why this

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1 00027:01 was --
2 02 A. Well, I don't need --
3 03 Q. -- new account --
4 04 A. All --
5 05 MR. VILKER: Just if you could, because for
6 06 the -- for the court reporter --
7 07 THE WITNESS: Right.
8 08 MR. VILKER: -- it's difficult if you're
9 09 answering while --
10 10 THE WITNESS: Oh, okay.
11 11 MR. VILKER: -- I'm asking.
12 12 THE WITNESS: Okay, I'm sorry.
13 13 MR. VILKER: So I just don't want to --
14 14 THE WITNESS: Okay.
15 15 MR. VILKER: -- mess up the -- the record
16 16 here.
17 17 Q. My question was did you ever -- did you
18 18 ever ask Raymour or did he ever tell you anything
19 19 about why the words "New Account Setup" were written
20 20 on this check?
21 21 A. I didn't even know it was, what you said
22 22 to me.
23 23 Q. Okay.
24 24 A. So I had no reason to ask him. That don't
25 25 even ring a bell to me, you know.

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1 00028:01 Q. Okay. Now, when you got this \$4,000
2 02 check --
3 03 A. Yup.
4 04 Q. -- what, if anything, did Raymour tell you
5 05 that this check was for?
6 06 A. Well, I don't know. He was running
7 07 something down. Same thing as this I guess. Same
8 08 thing he said to me about this is that, as far as
9 09 I'm concerned.
10 10 Q. And what is that?
11 11 A. Oh, man, I don't know what he said. I
12 12 don't know what he said. If I could put some words
13 13 together, I would either be lying or I would be
14 14 making up something that he said.
15 15 Q. Okay.
16 16 A. You know what I mean? Like names or
17 17 things that I've heard him say, yes, I know that
18 18 because I, you know, I pick up something like a
19 19 person's name or whatever else, but to frame right
20 20 what he said to me --
21 21 Q. Okay. Without -- without --
22 22 A. Not unless he said to me that he was
23 23 taking me up and he was gonna hang me. I would have
24 24 remembered that --
25 25 Q. Okay.

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1 00029:01 A. -- you know.
2 02 Q. Okay. But what -- but what --
3 03 Mr. Bradshaw, what did you believe in your mind that
4 04 this \$4,000 check was for?
5 05 A. What did I believe in my mind it was? I
6 06 believed that somebody had given some money, all
7 07 right, to a suffering person or a person that, you
8 08 know, bad health, wasn't going to die or whatever,
9 09 and just was giving them the money. Now, I know how
10 10 stupid that sounds but that's what I, you know,
11 11 because -- because the way it came to me as if it
12 12 was a lot of us, see, and I wasn't the only one.
13 13 Q. Okay.
14 14 A. You know. It was -- I don't know how many
15 15 they said it was, but I was getting on the end of
16 16 it.
17 17 Q. Okay.
18 18 A. And I said, wow, it sounds good, man, you
19 19 know. And, you know, so, hey, what the hell, you
20 20 know.
21 21 MR. MacFADYEN: Objection. Nonresponsive,
22 22 and also it doesn't relate to what he actually heard
23 23 or perceived.
24 24 MR. VILKER: I believe his understanding of
25 25 why he was receiving the money is relevant and

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1 00030:01 therefore admissible, and I believe it was responsive
2 02 to the question.
3 03 Q. Okay. Now, during -- during these
4 04 meetings that you had with Raymour, did he ask you
5 05 to sign any documents?
6 06 A. Yeah. I signed some papers, yeah.
7 07 Q. Okay. Do you recall as you're sitting
8 08 here today about how many documents you signed?
9 09 A. Wow, man, let's see. One, two, three. I
10 10 don't know. I'm going to guess about six maybe. I
11 11 don't know. I'm just guessing that because I don't
12 12 know.
13 13 Q. Okay. Did you read these documents
14 14 yourself before you signed them?
15 15 A. No. No, I don't read them, no.
16 16 Q. Okay. Approximately how much time did you
17 17 spend looking at these documents before you signed
18 18 them?
19 19 A. I just glanced at it and signed.
20 20 Q. Okay. Did Raymour read those documents to
21 21 you before you signed them?
22 22 A. Word for word? No, not -- not the whole
23 23 document, no.
24 24 Q. Okay.
25 25 A. No.

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1 00031:01 Q. Do you remember him reading parts of the
2 02 documents to you?
3 03 A. I mean I remember him saying something to
4 04 me, you know, but here again it meant nothing to
5 05 what he was saying to me. You know, at least, you
6 06 know, as long as I didn't hear him say he was gonna
7 07 cut my head off or take my life, nothing else meant
8 08 nothing there, you know what I mean?
9 09 And that's just the way it is. Nothing
10 10 meant nothing, you know, unless it was something that
11 11 would get me screwed up, like take my life or
12 12 something or he was gonna cut my arm or take my arms
13 13 or give my life away or something, you know.
14 14 Q. Okay.
15 15 A. Then I would have wanted to, you know,
16 16 really get into it, you know. But everything --
17 17 hey, you're giving away 2, \$4,000, give it. You got
18 18 some more? Give me some more.
19 19 Q. Okay. So you didn't really care what was
20 20 on the documents you were signing?
21 21 A. Well, care. When you say care, I don't --
22 22 I don't think it's nothing illegit to care about. I
23 23 mean what do I need to care about?
24 24 Q. Okay.
25 25 A. You know? You know, what do I need to

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1 00032:01 care about?
2 02 Q. Okay.
3 03 A. You know what I mean? That's -- that's,
4 04 you know, I mean if I thought it was something to
5 05 care about, I wouldn't be stupid enough to put my
6 06 name on it.
7 07 Q. Okay.
8 08 A. You know.
9 09 Q. Now, have you ever had any kind of legal
10 10 training?
11 11 A. Legal training?
12 12 Q. Law school?
13 13 A. What do you mean?
14 14 Q. You're not an attorney?
15 15 A. In the street, yeah. You gotta be an
16 16 attorney in the street, yeah.
17 17 Q. Better than most of us I'm imagining, but
18 18 you haven't had any formal legal training. Now, did
19 19 you ever ask to have an attorney review the
20 20 documents that you were signing?
21 21 A. No. I didn't think I needed it.
22 22 Q. Did you ever ask anyone else that you
23 23 knew --
24 24 A. No.
25 25 Q. -- to review the documents?

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1 00033:01 A. No.
2 02 Q. Okay.
3 03 A. See that, see those questions you're
4 04 asking me right there, see this thing to me was
5 05 never that big --
6 06 Q. Okay.
7 07 A. -- at all, you know what I mean? You
8 08 know, this was never that big at all, you know what
9 09 I mean? Like say you sitting in here, all of you
10 10 are sitting in here and you said, "Leon, wow, we got
11 11 a thousand dollars for you." What do I care? Why
12 12 do I need an attorney? All you guys are attorneys,
13 13 all you sitting here, what do I need you for?
14 14 Q. All right.
15 15 A. Give me the thousand and go. Do the
16 16 paperwork and get on out of here and let me have it,
17 17 you know what I mean?
18 18 Q. Now, what do you remember, Mr. Bradshaw,
19 19 if anything, that Raymour told you that these
20 20 documents were for?
21 21 A. Oh, see, here again, here again, if I
22 22 could remember word for word what he said, I would.
23 23 Believe me, I would have no problem telling you.
24 24 Q. Okay.
25 25 A. But everything I say about what he said,

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1 00034:01 I'm gonna be guessing and I'm gonna be just saying
2 02 stuff --
3 03 Q. Okay.
4 04 A. -- and it ain't gonna come out right
5 05 because I don't know.
6 06 Q. Okay.
7 07 A. You know, I don't know. I just don't
8 08 remember, man.
9 09 Q. Okay. Now, did -- did Raymour make any
10 10 copies while you were there of any of the documents
11 11 that you were signing?
12 12 A. I didn't see none, no.
13 13 Q. Okay. Did he leave behind with you any of
14 14 the copies of any of the documents you signed?
15 15 A. No.
16 16 Q. Okay. Now, I would like to show you
17 17 Exhibit 8. Let me just put this here. Now, if you
18 18 could turn to the -- the -- the third page of this
19 19 exhibit. Okay. Do you see an "x"?
20 20 A. Yeah.
21 21 Q. And is that your signature after that?
22 22 A. Yeah.
23 23 Q. Okay. So this appears to be one of the
24 24 documents that you signed with Raymour?
25 25 A. Yeah, yeah.

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1 00035:01 Q. Okay.

2 02 MR. FLANDERS: Just a second. Did --

3 03 MR. VILKER: I said Exhibit 8.

4 04 MR. FLANDERS: Oh, I'm sorry, 8.

5 05 MR. VILKER: Yup.

6 06 MR. FLANDERS: Not 3?

7 07 MR. VILKER: No.

8 08 MR. FLANDERS: Okay.

9 09 Q. Okay. Now, am I correct that the rest of

10 10 Exhibit 8, other than your signature, has no other

11 11 handwriting on it?

12 12 A. Not that I know of.

13 13 Q. Okay.

14 14 A. But I don't even remember looking at this.

15 15 Q. Okay. That was my next question. Do you

16 16 remember looking at this document?

17 17 A. No. No, I just signed it, you know.

18 18 Q. Okay. Now, I would like to show you

19 19 Exhibit 3, which is the same basic document as

20 20 Exhibit 8 with some handwriting on the front page.

21 21 First of all, I would like to take the -- have you

22 22 look at the third page of Exhibit 3 --

23 23 A. Yeah.

24 24 Q. -- and ask if that's also your signature

25 25 next to Co-Owner?

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1 00036:01 A. Yeah. How did all that get in there?

2 02 Q. Okay. That is your signature on Exhibit

3 03 --

4 04 A. Yeah.

5 05 Q. -- 3?

6 06 A. How did all the rest of them get in there?

7 07 Q. Okay. Well, were there any other

8 08 signatures on the page at the time you signed it?

9 09 A. Anything I signed, my signature was the

10 10 only one on all of them. That much I remember.

11 11 Q. Okay. So the -- there's a signature here,

12 12 a Funds Provider, of Joseph Caramadre. Have you

13 13 ever met Mr. Caramadre before?

14 14 A. I wouldn't even know if I seen him, no.

15 15 Q. Okay. So Mr. Caramadre didn't sign any

16 16 documents in your presence?

17 17 A. He didn't sign nothing in front of me, no.

18 18 Q. Okay. Now --

19 19 A. I wouldn't even know him if I seen him.

20 20 Q. Now, as you look at this document now, do

21 21 you -- does this document look familiar to you?

22 22 A. This -- this looks like the same thing to

23 23 me. This all looks the same to me as I -- as I'm

24 24 looking at it.

25 25 Q. Right. But as you're looking at it now,

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1 00037:01 do you remember signing that document that day?

2 02 A. I don't remember signing the same document

3 03 over and over.

4 04 Q. Okay.

5 05 A. Because if I -- I had signed it, I would

6 06 remember seeing this. In other words, if you give

7 07 me two documents and I signed this and I'm looking

8 08 at this, it's not that I'm gonna say all I'm gonna

9 09 look at is this anyway. I would remember seeing

10 10 this looking the same as that.

11 11 Q. Okay.

12 12 A. You know.

13 13 Q. Now, I want to draw your attention to

14 14 paragraph 1 of this document.

15 15 MR. TRAINI: Which document?

16 16 MR. VILKER: Excuse me, Government Exhibit

17 17 3.

18 18 Q. It says, "The Funds Provider and the

19 19 Co-Owner" -- and you are identified as the co-owner

20 20 --

21 21 A. Uh-hum.

22 22 Q. -- "are joint tenants with rights of

23 23 survivorship in the above-referenced Brokerage

24 24 Account." Did you remember reading any language

25 25 about you opening up a -- a brokerage account?

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1 00038:01 A. Me?

2 02 Q. Yes.

3 03 A. No, man, I don't know about no brokerage

4 04 account.

5 05 Q. Okay. This indicates that Mr. Caramadre

6 06 and you would be joint tenants with rights of

7 07 survivorship in a brokerage account.

8 08 A. First I've seen of that, man.

9 09 Q. Okay.

10 10 MR. TRAINI: Excuse me, Mr. Vilker. I just

11 11 want to lodge an objection to the whole line of

12 12 questioning relative to these two documents because

13 13 it appears, and maybe I'm wrong, but it appears that

14 14 you're trying to establish that he signed Exhibit 8

15 15 in blank and then Exhibit 8 became Exhibit 3 when the

16 16 information was filled in later on. Is that what --

17 17 MR. VILKER: That's not what I'm trying to

18 18 establish. These appear to be similar documents and

19 19 there's two different signatures.

20 20 MR. TRAINI: Right.

21 21 MR. VILKER: So I just --

22 22 MR. TRAINI: I just want to make sure that

23 23 -- that you're not suggesting to the witness that

24 24 Exhibit 8 is the blank version of what later became

25 25 Exhibit 3.

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1 00039:01 MR. VILKER: No. There are two different
2 02 documents, obviously very similar. The text is
3 03 identical but they're -- they're two different
4 04 documents.
5 05 MR. TRAINI: Well, the order in which the
6 06 questions were being asked seemed to suggest that
7 07 that's what you were doing and I just want to make
8 08 sure that's not the case.
9 09 MR. VILKER: No, that's -- I apologize if
10 10 that's confusing.
11 11 MR. TRAINI: Thank you.
12 12 Q. Now, the -- if I could direct your
13 13 attention to paragraph 7 of Government Exhibit 3,
14 14 and I just want to read a line to you that starts
15 15 here, that the -- the final sentence in paragraph 7.
16 16 Excuse me, the final sentence on the first page as
17 17 in paragraph 7 that reads, "As a result of the
18 18 optional redemption feature, the securities could
19 19 yield a substantial profit for the Funds Provider if
20 20 the Co-Owner dies before the Funds Provider and the
21 21 securities are in the Account at the time of the
22 22 Co-Owner's death."
23 23 And my question is what, if anything, did
24 24 Raymour say to you about the possibility that someone
25 25 else could make any money upon your death?

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1 00040:01 MR. TRAINI: Objection, leading.
2 02 MR. VILKER: You can answer.
3 03 A. I don't remember -- I don't know about
4 04 death. That's the first time I heard about somebody
5 05 dying, death and all that stuff. See, in other
6 06 words, you got me now knowing that death -- that I
7 07 got money on -- I don't know nothing about this.
8 08 That's the first time I heard that --
9 09 Q. Okay.
10 10 A. -- that you brought that out to me.
11 11 Q. Okay.
12 12 A. You got me into something I don't know
13 13 nothing about.
14 14 Q. Okay. Now, I'd like to show you,
15 15 Mr. Bradshaw, Government Exhibit 4. Okay.
16 16 Government Exhibit 4 is entitled "Complete
17 17 Investment Account Application" from a company known
18 18 as E*Trade Financial. And before I ask you about
19 19 the -- the first page of the document, if you could
20 20 first turn to Page 3.
21 21 THE WITNESS: That's this right here?
22 22 MR. VILKER: Yes. Yup, that's the page.
23 23 Let me just see. Yes, this is Page 3.
24 24 Q. Now, do you -- do you see your signature
25 25 on that page above "Signature of Co-Account Holder"?

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1 00041:01 A. Yeah.
2 02 Q. Okay. Do you see the date next to your
3 03 signature of 08-13-2008?
4 04 A. Yeah.
5 05 Q. Okay. Did you -- is that date in your
6 06 handwriting?
7 07 A. No, I didn't -- no, that's not my
8 08 handwriting, no.
9 09 Q. Okay. Do you see the signature of the one
10 10 to the left of your -- your signature, "Primary
11 11 Account Holder," and there's a signature apparently
12 12 of Joseph Caramadre?
13 13 A. Yeah.
14 14 Q. Okay. Do you see the date there of
15 15 08-13-2008 next to Mr. Caramadre?
16 16 A. Yeah, I see it.
17 17 Q. Okay.
18 18 A. I see it now, yeah.
19 19 Q. Is that date in your handwriting?
20 20 A. No, that's not me.
21 21 Q. Okay. When you signed this form --
22 22 A. Yeah.
23 23 Q. -- was Mr. Caramadre's signature already
24 24 on the form?
25 25 A. Hey, that's a good question.

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1 00042:01 Q. If you can remember.
2 02 A. I don't remember seeing it, no.
3 03 Q. Okay. Now, if you turn to the next page,
4 04 the fourth page of this document. Okay. Do you see
5 05 your signature on the bottom right?
6 06 A. Yeah. The bottom right?
7 07 Q. Well, the --
8 08 A. This one?
9 09 Q. Yes. Do you see your signature above
10 10 where it says --
11 11 A. Yeah.
12 12 Q. -- "Signature of Co-Account Holder"?
13 13 A. Yeah.
14 14 Q. Okay. And do you see the date --
15 15 A. Yeah.
16 16 Q. -- next to your signature of 08-13-08?
17 17 A. That's not me, no.
18 18 Q. Okay. That's not your handwriting?
19 19 A. No.
20 20 Q. Okay. And do you see the signature of
21 21 "Primary Account Holder, Joseph Caramadre"?
22 22 A. Yeah.
23 23 Q. And do you see the date of 08-13-2008?
24 24 A. That's not me either.
25 25 Q. Okay. That's not your handwriting?

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1 00043:01 A. No.

2 02 Q. Okay. Now, if you could turn to the front

3 03 page of this document. Do you recall seeing the

4 04 front page of this document when you met with

5 05 Raymour?

6 06 A. Not like this.

7 07 Q. Okay. When you say not like this, what do

8 08 you mean?

9 09 A. Well, you got a lot of stuff on there.

10 10 Q. You don't remember seeing any document

11 11 that had all this information handwritten in it?

12 12 A. No.

13 13 Q. Okay. Well, this paragraph number 2 --

14 14 A. It could have been on there but I don't

15 15 remember seeing it.

16 16 Q. Okay.

17 17 A. I don't remember seeing this.

18 18 Q. Okay. Paragraph number 2 has information,

19 19 the Primary Account Holder on the left --

20 20 A. Yeah.

21 21 Q. -- of Joseph A. Caramadre?

22 22 A. See, see this Caramadre, right, you know,

23 23 I see his name is coming up a lot, and his name

24 24 didn't come up, you know what I mean, and all of a

25 25 sudden, I'm seeing it come up a lot, you know.

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1 00044:01 Q. Okay.

2 02 A. And I'm wondering, you know.

3 03 Q. Okay. Now, this document lists

4 04 Mr. Caramadre as the Primary Account Holder in this

5 05 E*Trade account --

6 06 A. Yeah.

7 07 Q. -- and you as the Co-Account Holder --

8 08 A. Yeah.

9 09 Q. -- in the E*Trade account. What, if

10 10 anything, did Raymour say to you about opening up a

11 11 joint account with Mr. Caramadre in a brokerage

12 12 firm?

13 13 A. No.

14 14 Q. Okay. Do you recall him mentioning the

15 15 name of the company --

16 16 A. No.

17 17 Q. -- E*Trade Financial?

18 18 A. No, we didn't talk about nothing like

19 19 that.

20 20 Q. Okay. Now, if you turn to -- you see your

21 21 name written on the first page of this document?

22 22 A. I see it up here.

23 23 Q. Okay. Now --

24 24 A. But that don't look like me though.

25 25 Q. Okay. Now --

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1 00045:01 A. That's not mine.

2 02 Q. That's not your handwriting?

3 03 A. No.

4 04 Q. Okay, but it is your name. Was that your

5 05 address at the time?

6 06 A. Yeah.

7 07 Q. Okay. Now, at the time -- you see how

8 08 there's a box under your address?

9 09 A. Yeah.

10 10 Q. It says "Home Phone"?

11 11 A. Yeah.

12 12 Q. And it's blank?

13 13 A. Yeah.

14 14 Q. Did you have a home phone at the time?

15 15 A. Yeah. I got a home phone.

16 16 Q. Okay. And had you provided that number to

17 17 Raymour?

18 18 A. Yeah. He knows my home phone.

19 19 Q. Okay.

20 20 A. But that's not it.

21 21 Q. Well, next to "Home Phone" there's a box

22 22 called "Business Phone," and it lists a phone number

23 23 of 401-941-9273.

24 24 A. Yeah, but I don't have a business phone.

25 25 Q. Okay. Well, that was my next question.

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1 00046:01 Did you have any kind of business at the time?

2 02 A. No.

3 03 Q. Okay. And was that phone number your

4 04 phone number in any way?

5 05 A. This has nothing to do with me.

6 06 Q. Okay. Now, I'd like to show you Exhibit

7 07 5. All right. Exhibit 5, Mr. Bradshaw, is entitled

8 08 "Options Trading Application," and it's again with

9 09 E*Trade Financial. My first question is do you know

10 10 what options trading is?

11 11 A. Options trading?

12 12 Q. Right.

13 13 A. No, I don't know what it is. Options

14 14 means what, you got options trading, something like

15 15 that?

16 16 Q. Okay.

17 17 A. Option? Is that the real word, option?

18 18 Q. It's whatever you -- you -- it's -- my

19 19 understanding of --

20 20 A. Well, if you would come to me about

21 21 options trading, I would think that I got a option

22 22 to trade something.

23 23 Q. Okay. But do -- do you remember having

24 24 any conversations with Raymour --

25 25 A. No. We never had no -- no --

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1 00047:01 MR. VILKER: If you could just let me
 2 02 finish the question.
 3 03 THE WITNESS: Oh, I'm sorry.
 4 04 Q. Did you have any conversations with
 5 05 Raymour about anything to do with options trading?
 6 06 A. No. That didn't even come up. The
 7 07 options trading thing didn't even come up with him
 8 08 and me.
 9 09 Q. Okay. Now, if you look at the second page
 10 10 of this document. Okay. Do you see your signature
 11 11 there?
 12 12 A. Yes.
 13 13 Q. Okay. Next to your signature there's a
 14 14 date of 08-13-08. Did you -- is that date in your
 15 15 handwriting?
 16 16 A. That's not me, no.
 17 17 Q. Okay. Now, next to the signature of the
 18 18 Primary Account Holder, Joseph Caramadre --
 19 19 A. Right.
 20 20 Q. -- there's a date of 08-3-2008 (sic). Is
 21 21 that date in your handwriting?
 22 22 A. No, that's not me.
 23 23 Q. Okay. Now, if you turn back to the first
 24 24 page, there's a section on the right called
 25 25 "Co-Account Holder, If Applicable"?

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1 00048:01 A. Yeah, I see it.
 2 02 Q. Okay. Now, the first thing it asks --
 3 03 well, did you -- did -- let me -- before I ask this,
 4 04 did Raymour ask you any questions in which he was
 5 05 putting x's on a form after your answers?
 6 06 A. I -- you know what, I don't remember. No,
 7 07 I don't remember none of this.
 8 08 Q. Okay.
 9 09 A. No.
 10 10 Q. Let me --
 11 11 A. No. The --
 12 12 Q. The first question asks --
 13 13 A. Go ahead.
 14 14 Q. Okay, I'm sorry. The first question it
 15 15 asks under "Co-Account Holder, If Applicable," is
 16 16 "Marital Status" and it's "Single." Is it -- that
 17 17 is correct, you're single?
 18 18 A. That don't even sound like me because I
 19 19 would have told them divorced.
 20 20 Q. Okay. You're divorced?
 21 21 A. Yeah.
 22 22 Q. Okay. Now, if you go down two -- two
 23 23 rows, it says, "Options Investment Knowledge" and
 24 24 there's a box marked "Good." First of all, let me
 25 25 ask, did you make that "x" in that box?

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1 00049:01 THE WITNESS: In which box? I see "Covered
 2 02 Calls" here.
 3 03 MR. VILKER: Okay. One line up.
 4 04 THE WITNESS: Oh, here, yeah.
 5 05 MR. VILKER: One line up where it says,
 6 06 "Options --
 7 07 THE WITNESS: Right, right.
 8 08 MR. VILKER: -- "Investment Knowledge,
 9 09 Good."
 10 10 A. Let me say this. I don't -- I don't make
 11 11 no x's in none of these boxes.
 12 12 Q. Okay. Well, is it --
 13 13 A. So --
 14 14 Q. -- is it accurate that you had -- you
 15 15 would describe yourself as having a good knowledge
 16 16 of option investments?
 17 17 A. I don't even know what option investments
 18 18 are. No, I don't have no knowledge of none of that,
 19 19 no.
 20 20 Q. Okay. Now, the next box below says,
 21 21 "Options Trading Experience," and the boxes are
 22 22 marked -- well, let me ask you one at a time. Do
 23 23 you have options trading experience in covered
 24 24 calls?
 25 25 A. I don't have no trading experience in

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1 00050:01 nothing.
 2 02 Q. Okay. The next box is "Covered puts," and
 3 03 there's an "x" in that box. Do you have any options
 4 04 trading experience in covered puts?
 5 05 A. Covered puts? What is that? What are
 6 06 they? I don't even know what that is, covered puts,
 7 07 whatever it is.
 8 08 Q. Okay. Do you have options trading
 9 09 experience in purchases?
 10 10 A. I don't even know what that means to be
 11 11 honest with you.
 12 12 Q. Okay. Now, below that asks questions on
 13 13 years of experience, and it says both for stocks,
 14 14 bonds, options and futures --
 15 15 A. Uh-hum.
 16 16 Q. -- that you have ten years of experience
 17 17 with all these different types of investments. Is
 18 18 that true?
 19 19 A. No, that's not true.
 20 20 Q. Okay.
 21 21 A. As a matter of fact, if you add it up,
 22 22 none of this stuff is true here.
 23 23 Q. Okay. Do you recall Raymour ever asking
 24 24 you anything about your investment experience?
 25 25 A. No. No, nobody asked me none of that

Bradshaw, Leon 12.1.09 video depo

1 00051:01 stuff.
2 02 Q. Okay.
3 03 A. Because I'd cut that right out. I don't
4 04 have no investments. Investments in what, you know
5 05 what I mean? I mean that's a laugh.
6 06 Q. Okay. Mr. Bradshaw, I would like to now
7 07 show you Government Exhibit 6.
8 08 A. Okay.
9 09 Q. Now, Exhibit 6 -- it seems like I'm
10 10 missing the original here. Exhibit 6 is a document
11 11 from E*Trade Financial that's entitled, "Power of
12 12 Attorney," and in parentheses, "With provisions for
13 13 durable." And before I ask you about this document,
14 14 if you could turn to the second page, and do you
15 15 see, in the middle of the second page, above where
16 16 it's typed in, "Signature of Co-Account Holder,"
17 17 your signature?
18 18 THE WITNESS: Over here?
19 19 MR. VILKER: Yes.
20 20 A. Yeah, right there.
21 21 Q. Okay. That's your signature? Now, do you
22 22 see next to your signature the date 08-13-08?
23 23 A. Yeah. That's not me though.
24 24 Q. Okay. That's not your handwriting?
25 25 A. No.

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1 00052:01 Q. Okay. Now, above that, next to the
2 02 signature of Joseph Caramadre, there's a date
3 03 08-13-2008. Is that your handwriting?
4 04 A. No, that not mine.
5 05 Q. Okay. Now, at any time when you signed
6 06 these documents with Raymour, was there a notary
7 07 public that was there notarizing your signature?
8 08 A. There was nobody there. Him and me,
9 09 that's all.
10 10 Q. Okay. The next section identifies a
11 11 notary public by the name of Danielle Rousseau.
12 12 Have you ever met Miss Rousseau, to your knowledge?
13 13 A. No.
14 14 Q. Okay. And there was no one there that was
15 15 notarizing your signature?
16 16 A. No.
17 17 Q. Okay. Now, if you turn back to the front,
18 18 first page, this provides a limited power of
19 19 attorney to Raymour Radhakrishnan. What, if
20 20 anything, did Mr. Radhakrishnan, or Raymour as -- as
21 21 you knew him, say to you about you providing him
22 22 with power of attorney?
23 23 A. That was never mentioned to me about I'm
24 24 providing nobody with power of attorney.
25 25 Q. Okay. Is that something that you would

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1 00053:01 have remembered?
2 02 A. Sure. Sure I would have remembered.
3 03 Q. Okay.
4 04 A. If I had been approached with something
5 05 like that, I wouldn't be sitting here. You'd still
6 06 have your money and I'd be sitting over here.
7 07 Q. Okay. Now, I would like to show you
8 08 Government Exhibit 7. Okay. Government Exhibit 7
9 09 is a statement from September 1st, 2009 through
10 10 September 30th, 2009 from E*Trade Securities.
11 11 A. Yeah.
12 12 Q. And it's addressed to Joseph Caramadre and
13 13 Leon Bradshaw --
14 14 A. Uh-hum.
15 15 Q. -- at 90 Beechwood Drive in Cranston,
16 16 Rhode Island.
17 17 A. Wow.
18 18 Q. Have -- is that -- 90 Beechwood Drive in
19 19 Cranston, Rhode Island, is that your residence?
20 20 A. I don't even know where it is.
21 21 Q. Okay. Have you ever received any
22 22 statements in the mail from E*Trade Securities?
23 23 A. No, not that I know of.
24 24 Q. Okay.
25 25 A. Not that I know of because all this -- all

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1 00054:01 this stuff I just -- I rip up a lot of mail. No, I
2 02 never had nothing, no.
3 03 Q. Okay. Prior to meeting with the
4 04 Government in this case, did you have any knowledge
5 05 that there was an account opened in your name at
6 06 E*Trade Securities?
7 07 A. No, no.
8 08 Q. Okay.
9 09 A. No.
10 10 Q. Now, in the middle of the first page it
11 11 lists the balance, as of September 30th of 2009, as
12 12 \$360,148.48. Do you see that?
13 13 A. I see it here, yeah.
14 14 Q. Okay. Now, what knowledge, if any, did
15 15 you have or do you have of having more than \$360,000
16 16 in an account in your name in E*Trade Securities?
17 17 A. I got \$360 (sic) in an account for me?
18 18 Q. This is an account in your name and
19 19 Mr. Caramadre's name.
20 20 A. And I don't know nothing about it?
21 21 Q. Right. That's what I'm asking. Do you
22 22 know anything about it?
23 23 A. That's the first I heard of it. It's the
24 24 first I heard of it. Give me some of it.
25 25 Q. Okay.

Bradshaw, Leon 12.1.09 video depo

1 00055:01 A. That's the first -- 300 -- you gotta be
 2 02 kidding me.
 3 03 Q. Okay.
 4 04 THE WITNESS: How come I don't know nothing
 5 05 about it?
 6 06 MR. VILKER: Okay. I have no further
 7 07 questions at this time, Mr. Bradshaw. At this time
 8 08 I'm going to switch seats, if you want to --
 9 09 THE VIDEOGRAPHER: I'm just going to turn
 10 10 the mic down for a second.
 11 11 EXAMINATION
 12 12 BY MR. PINE:
 13 13 Q. Mr. Bradshaw, my name is Jeffrey Pine. I
 14 14 am an attorney for Raymour Radhakrishnan.
 15 15 A. Yeah, good.
 16 16 Q. And I would like to be able to ask you a
 17 17 few questions about --
 18 18 A. Go ahead.
 19 19 Q. -- a few things that you talked about with
 20 20 Mr. Vilker. You said that you were first introduced
 21 21 to Mr. -- to Raymour by your nurse, Cathy; is that
 22 22 right?
 23 23 A. Introduced? Yeah, she told me about him.
 24 24 Q. She first mentioned about --
 25 25 A. When you say introduced, what do you mean,

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1 00056:01 introduced hands or what?
 2 02 Q. She first mentioned his name to you?
 3 03 A. Yeah.
 4 04 Q. Okay. And after she mentioned his name to
 5 05 you, did you call -- do you know whether you called
 6 06 him or he called you?
 7 07 A. No, I didn't call him.
 8 08 Q. Okay.
 9 09 A. He called me.
 10 10 Q. He called you?
 11 11 A. Yeah.
 12 12 Q. Do you know when that was?
 13 13 A. No.
 14 14 Q. Would you be --
 15 15 A. No. I don't know the date, no.
 16 16 Q. Okay. Do you know what month it was?
 17 17 A. What month. Now, let me see. It's -- it
 18 18 could have been around October, I don't know --
 19 19 Q. Of what year?
 20 20 A. -- September. It could have been
 21 21 September or October.
 22 22 Q. Of what year?
 23 23 A. Of -- wow, it could have been last year.
 24 24 Q. Okay.
 25 25 A. Yeah.

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1 00057:01 Q. So it could have been September, October
 2 02 of 2008?
 3 03 A. Yeah. It could have been around there
 4 04 somewhere.
 5 05 Q. But you're not sure as you sit here today?
 6 06 A. No.
 7 07 Q. In fact, how is -- how would you say your
 8 08 memory is with respect to the -- all the meetings
 9 09 that you had with Raymour back in 2008?
 10 10 A. How's my memory? Okay, my memory is right
 11 11 on the money to when I cashed the check.
 12 12 Q. Right on the money?
 13 13 A. He gave me the check and I cashed it,
 14 14 boom. The date they got there, that's right on the
 15 15 money.
 16 16 Q. And it sounded to me when you were being
 17 17 asked questions by Mr. Vilker that --
 18 18 THE WITNESS: Mr. who?
 19 19 MR. PINE: Lee Vilker, the pros --
 20 20 THE WITNESS: Oh, okay.
 21 21 MR. PINE: From the Federal Government.
 22 22 THE WITNESS: Yeah.
 23 23 Q. It sounded to me when you were asked
 24 24 questions, and you said it a few times, the money
 25 25 was your focus?

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1 00058:01 A. That's what it is. That's what it is
 2 02 right now.
 3 03 Q. If we put a thousand dollars on the table
 4 04 now, you'd take it?
 5 05 A. You wanna know something? If you put a
 6 06 thousand dollars on the table now, I'll take it.
 7 07 You're absolutely right.
 8 08 Q. Okay.
 9 09 A. You got that right.
 10 10 Q. And if I signed you -- if I asked you to
 11 11 sign some documents to accept that money, would you
 12 12 sign them?
 13 13 A. Not now because I don't trust -- no, I
 14 14 don't trust you.
 15 15 Q. Okay. Would you have signed them in 2008,
 16 16 if we just met in 2008 because we were introduced --
 17 17 A. Not in this setup, no.
 18 18 MR. VILKER: Objection.
 19 19 A. No, not in this setup because I don't
 20 20 trust you now.
 21 21 Q. Okay. You don't trust me or any of the --
 22 22 A. Well, I don't -- I don't trust what's
 23 23 going down --
 24 24 Q. Okay. All right.
 25 25 A. -- period, you know what I mean? And --

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1 00059:01 and so the -- the fact that -- that I don't know
2 02 what's going down --
3 03 Q. Okay.
4 04 A. -- and I don't know what went down or
5 05 whatever. I don't trust any of you. The only thing
6 06 I can tell you is my part of it, you know what I
7 07 mean, and that's how I'm going to end up.
8 08 Q. Okay. But in 2008, when you met with
9 09 Raymour on more than one occasion --
10 10 A. Right.
11 11 Q. -- your interest was -- at that time was
12 12 in the money that he was offering on behalf of some
13 13 wealthy guy?
14 14 A. Well, my -- my interest, my interest was
15 15 first to -- to -- to -- to hear what he had to say,
16 16 you know, why did he want to see me.
17 17 Q. Okay. And did he tell you that?
18 18 A. Well, he told me that but what he said to
19 19 me -- once I heard the word money, that's all I
20 20 needed to hear.
21 21 Q. Okay.
22 22 A. I didn't need to hear nothing else.
23 23 Q. The first time you met with him, do you
24 24 know how long you met?
25 25 THE WITNESS: You mean how long I was with

Bradshaw, Leon 12.1.09 video depo

1 00060:01 him?
2 02 MR. PINE: Uh-hum.
3 03 A. No, not really. No.
4 04 Q. Do you have any approximation how long he
5 05 spent with you?
6 06 A. No, because I could be lying, you know.
7 07 Q. Okay.
8 08 A. I could be just thinking --
9 09 Q. You don't recall it?
10 10 A. I'd rather not saying nothing when I don't
11 11 really know.
12 12 Q. Okay.
13 13 A. I didn't look at my watch --
14 14 Q. Okay.
15 15 A. -- to see, you know what I mean? I don't
16 16 know.
17 17 Q. But you met with him at your apartment
18 18 here in this building, right?
19 19 A. Every time I seen him it was here --
20 20 Q. Okay.
21 21 A. -- in my place.
22 22 Q. So he came to your apartment, and did he
23 23 explain why he was there to offer you some money?
24 24 What do you remember about that?
25 25 A. What do I remember about that? Oh, wow.

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1 00061:01 The only thing I remember about that is, you know,
2 02 what comes right out of my head right now is that he
3 03 said things to me which -- which went over my head
4 04 which I wasn't interested in anyway.
5 05 Q. Okay.
6 06 A. Okay? But then when the word -- this
7 07 person, you know, money and stuff, you know, now my
8 08 ears perk up.
9 09 Q. Right.
10 10 A. You know what I mean?
11 11 Q. And --
12 12 A. Yeah.
13 13 Q. And clearly --
14 14 A. The word money --
15 15 Q. Right.
16 16 A. -- brought me to my senses, you know.
17 17 Q. Okay. And so as a result of that meeting,
18 18 you understood that he was going to offer you a sum
19 19 of money, \$2,000?
20 20 A. I didn't know what he was gonna offer me.
21 21 I -- I wasn't -- I didn't know if he was gonna offer
22 22 me money.
23 23 Q. Okay. But at some point --
24 24 A. But I know -- I know what he was getting
25 25 ready to say to me had to do with money --

Bradshaw, Leon 12.1.09 video depo

1 00062:01 Q. Right.
2 02 A. -- you know.
3 03 Q. At some point in that meeting, the subject
4 04 of money came up?
5 05 A. Well, yeah. Yeah, sure.
6 06 Q. Okay. And that had your interest?
7 07 A. Sure, money got my interest.
8 08 Q. Okay.
9 09 A. Sure it does.
10 10 Q. Okay. And you just said if something went
11 11 over your head, you didn't really ask him any
12 12 questions about it because you were more concerned
13 13 about getting the money?
14 14 A. Let me say this to you, and this is where
15 15 my frame of mind was, all right? The fact that I
16 16 might be getting money, I could care less about what
17 17 he said to me --
18 18 Q. Uh-hum.
19 19 A. -- other than he was -- if he was gonna
20 20 take my life away from me --
21 21 Q. Right.
22 22 A. -- cut my arms off, you know, you know
23 23 what I mean, he had where he could do what he wanted
24 24 to do with me. If I was under that impression, just
25 25 we would never be here.

Bradshaw, Leon 12.1.09 video depo

1 00063:01 Q. Right.

2 02 A. You know what I mean, like if I had no

3 03 say-so in my life or no nothing or no nothing, what

4 04 you guys call power of attorney --

5 05 Q. Uh-hum.

6 06 A. -- all right? Now, if I was under the

7 07 impression with that, we would never be here, you

8 08 know, if I had known that, period.

9 09 Q. Well, is it possible he mentioned it to

10 10 you but you didn't pay much attention to it?

11 11 A. Anything is possible, but power of

12 12 attorney, yes.

13 13 Q. Okay. What about the other --

14 14 A. Yeah.

15 15 Q. -- documents, the other applications? I

16 16 think you said he went over them but not necessarily

17 17 word by word. Is that accurate?

18 18 A. Over them, over them, over them, boom.

19 19 Q. Well, did he talk to you about them?

20 20 A. No. No, he didn't talk to me. He might

21 21 have said a couple of words or something which meant

22 22 --

23 23 Q. Would he --

24 24 A. -- which meant nothing, and I can't -- I

25 25 can't tell you because I don't remember what he

Bradshaw, Leon 12.1.09 video depo

1 00064:01 said.

2 02 Q. Okay.

3 03 A. You know, I mean he didn't take it and

4 04 explain it to me.

5 05 Q. Did the documents --

6 06 A. You know what I mean?

7 07 Q. Did the documents look like they do now?

8 08 Did it say E*Trade in bold print and it did say

9 09 other things that are printed on it?

10 10 A. They just looked like --

11 11 Q. Not necessarily that one.

12 12 A. The only thing -- the only thing that I

13 13 can actually identify would be there.

14 14 Q. Okay. So --

15 15 A. You asked me how it looked. That's how it

16 16 looked to me.

17 17 Q. Right.

18 18 A. With something on here.

19 19 Q. Do you recall whether or not the writing

20 20 was on there at the time that you signed?

21 21 A. No. I don't remember seeing writing.

22 22 Q. Okay. Is it possible he filled it out

23 23 with you while you went through it?

24 24 A. I don't know what he -- I don't know what

25 25 he done. I don't know what he done if anything.

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1 00065:01 Q. Well, my question is do you have a memory,

2 02 sitting here today, of your meeting with him at the

3 03 time that you signed it? In other words, how much

4 04 do you remember about that time that you signed it?

5 05 A. You asked me. I don't see him fill

6 06 nothing out.

7 07 Q. I'm sorry?

8 08 A. I don't see him fill nothing out.

9 09 Q. Okay. But you signed on -- for instance,

10 10 on page --

11 11 A. He gave me --

12 12 Q. -- on Exhibit 5 --

13 13 A. -- he gave me --

14 14 Q. -- hold on one second. On Exhibit 5, you

15 15 signed on Page 2. That's your signature?

16 16 A. Yeah. I don't know what page it is. He

17 17 just said sign here, sign here, sign here. I'm

18 18 signing.

19 19 Q. Okay.

20 20 A. I could care less what page it is. I

21 21 wasn't even looking at the page.

22 22 Q. Did you ask him any questions about it?

23 23 A. I had no questions to ask him. No, I

24 24 didn't need to ask him no questions.

25 25 Q. Okay. You didn't --

Bradshaw, Leon 12.1.09 video depo

1 00066:01 A. I got no questions to ask him. All I

2 02 know is he's giving me money. I could care less.

3 03 Q. Right.

4 04 A. As long as he's not taking my life or

5 05 taking me --

6 06 Q. Did he ever tell you not to read them?

7 07 A. No.

8 08 Q. Okay. He didn't prevent you from reading

9 09 it, did he?

10 10 A. No. What did I need to read it for?

11 11 Q. Okay. That was your -- your mind-set was

12 12 that you didn't need to read them?

13 13 A. Yeah. I'm no lawyer. I didn't need to

14 14 read it.

15 15 Q. Okay.

16 16 A. All I know is he's giving me money. Give

17 17 it to me.

18 18 Q. Okay. And so you didn't object to signing

19 19 those documents at all, did you?

20 20 A. No, because I -- that's out of trust and

21 21 that's no good, you know.

22 22 Q. Right. But I'm saying he didn't --

23 23 A. I learned that in the street, but I let --

24 24 I went for it there.

25 25 Q. And, in fact, he paid you the money?

Bradshaw, Leon 12.1.09 video depo

1 00067:01 A. Yeah. I went for that in the street. I
 2 02 got -- I got beaten here from what I learned in the
 3 03 street, you know, and so that's right. I guess
 4 04 that's what you get for not going to college, right?
 5 05 Q. Well, he paid you on two occasions, right?
 6 06 A. Yeah.
 7 07 Q. A total of \$2,000 and then --
 8 08 A. Yeah.
 9 09 Q. -- \$4,000?
 10 10 A. Yes.
 11 11 Q. And you cashed those checks?
 12 12 A. Yes.
 13 13 MR. PINE: I'm going to ask that these two
 14 14 exhibits be marked for the defense, please. I'm just
 15 15 going to show you a couple of documents.
 16 16 MR. VILKER: I'd like to put on the record
 17 17 that these are exhibits the Government hasn't seen
 18 18 yet, that the defense or the targets are under an
 19 19 obligation, as is the Government, to provide any
 20 20 documents before the testimony is to take place or
 21 21 they are in admissible.
 22 22 MR. PINE: For the record, they were
 23 23 received today and I am providing them to counsel.
 24 24 MR. VILKER: Well, we are objecting to
 25 25 their use in this deposition but you can proceed.

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1 00069:01 Q. And the stamp from the bank seems to say
 2 02 August 4th, 2008?
 3 03 A. Yeah. Whenever I got it, I cashed it.
 4 04 Q. Okay. All right. And with respect to
 5 05 Exhibit B, showing you that, does that depict the
 6 06 \$4,000 check?
 7 07 A. Let me see it. Yeah, okay.
 8 08 Q. And is that your signature --
 9 09 A. That's me, yeah.
 10 10 Q. -- that appears? Okay. And the date on
 11 11 that check is September 2nd --
 12 12 A. Whenever I got it --
 13 13 Q. -- 2008?
 14 14 A. -- I cashed it.
 15 15 Q. And you went to Citizens Bank and you
 16 16 cashed that one too?
 17 17 A. Yup.
 18 18 Q. So as a result of meeting with Raymour,
 19 19 you were paid \$6,000?
 20 20 A. Yup.
 21 21 Q. Right?
 22 22 A. Yup.
 23 23 Q. You never had to pay him anything?
 24 24 A. No.
 25 25 Q. Okay. And you signed some documents?

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1 00068:01 (Defendants' Exhibits B and C were marked
 2 02 for identification.)
 3 03 Q. Showing you what's been marked B and C.
 4 04 I'll show you C first.
 5 05 A. Yes.
 6 06 Q. Do you recognize the check that's --
 7 07 A. Let me see.
 8 08 Q. -- shown on that?
 9 09 A. Yup. \$2,000.
 10 10 Q. Okay. And in the middle of the page, it's
 11 11 depicted -- there's a signature there.
 12 12 A. Yeah.
 13 13 Q. Is that your signature?
 14 14 A. Yup, that's me.
 15 15 Q. Okay. And, in fact, you -- you cashed
 16 16 that check when it was given to you on April --
 17 17 on --
 18 18 A. I don't know --
 19 19 Q. -- strike that -- August 4th?
 20 20 A. I don't know these dates. I don't know
 21 21 these dates but I cashed it.
 22 22 Q. All right. Well, the date on the check is
 23 23 August 4th, 2008?
 24 24 A. So that's probably when I cashed it, as
 25 25 soon as I got it.

Bradshaw, Leon 12.1.09 video depo

1 00070:01 A. Yeah.
 2 02 Q. And he showed you -- he presented the
 3 03 documents to you?
 4 04 A. Yeah.
 5 05 Q. You signed on the pages where it asked for
 6 06 your signature?
 7 07 A. Yeah.
 8 08 Q. And do you recall how long he spent with
 9 09 you on the day that you signed the documents?
 10 10 A. No, no, no. I wasn't keeping no time, you
 11 11 know.
 12 12 Q. Okay. Did you -- when he -- when he came
 13 13 over, did he just talk -- did you and he just talk
 14 14 about things or did you talk about other things?
 15 15 A. I didn't talk at all. We didn't talk
 16 16 about nothing, no.
 17 17 Q. You don't remember talking about anything
 18 18 with him?
 19 19 A. I had nothing to talk to him about.
 20 20 Q. Okay.
 21 21 A. I was waiting for him to hurry up and get
 22 22 out of there after he got me the money.
 23 23 Q. Okay. Your interest again was --
 24 24 A. That's right, that's my interest.
 25 25 Q. Okay. In fact, you said -- you told

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1 00071:01 Mr. Vilker the -- the exact words that he may have
2 02 said during the course of the meeting were not that
3 03 important to you, the money was important to you?
4 04 A. That's true.
5 05 Q. Okay.
6 06 A. Yeah. You got that right, yeah.
7 07 Q. And if he said things that went over your
8 08 head, why is it that you didn't ask him any
9 09 questions about the things that went over your head?
10 10 A. I don't need to. What do I need to for?
11 11 Q. You didn't feel you needed to?
12 12 A. No.
13 13 Q. Okay. Now, with respect to Exhibit 4,
14 14 that also has the bold print of E*Trade Financial,
15 15 correct?
16 16 A. That's what it says on there, yeah.
17 17 Q. Okay. And it has "Complete Investment
18 18 Account Application"?
19 19 A. That's what it says on there, yeah.
20 20 Q. Okay. Do you remember whether or not this
21 21 was filled out at all while you were with Raymour?
22 22 A. No, no, it wasn't filled out. I don't
23 23 remember it being filled out.
24 24 Q. Okay. And is it that you don't remember
25 25 it being filled or it wasn't?

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1 00072:01 A. I don't remember it being filled out.
2 02 Q. Okay. And with respect to the information
3 03 that appears in the column with your name, how did
4 04 it come about that you -- your Social Security
5 05 number, is that on there?
6 06 A. Let me see it.
7 07 Q. Is that --
8 08 A. That's on there, yeah.
9 09 Q. That's your number?
10 10 A. Yeah. It's not my writing but it's my
11 11 number.
12 12 Q. Okay. And you gave him that information
13 13 during the course of your meetings?
14 14 A. Not that I remember.
15 15 Q. How did he find out your Social Security
16 16 number --
17 17 A. I don't know.
18 18 Q. -- do you know?
19 19 A. I don't know.
20 20 Q. Okay. Is it possible that in the course
21 21 of discussing with him various things --
22 22 A. I mean -- I mean you figure somebody like
23 23 me, it's not hard to find out nothing about me.
24 24 Q. Right, but I'm asking whether or not you
25 25 remember talking to him about it.

Bradshaw, Leon 12.1.09 video depo

1 00073:01 A. No. I don't talk to him about nothing
2 02 like what you're talking about now.
3 03 Q. In any of the meetings, you didn't talk to
4 04 him about anything?
5 05 A. I had no reason to, no good reason. He's
6 06 giving away money. What do I need to talk to him
7 07 for, you know.
8 08 Q. Well --
9 09 A. Like I said, the only reason that I would
10 10 have to talk to him would be if I thought he was
11 11 threatening my life --
12 12 Q. Right.
13 13 A. -- or something like that. I mean the man
14 14 was giving away money. Why do I need to talk about?
15 15 Q. But he --
16 16 A. I wanted to tell him to get the heck out
17 17 and give me the money and go.
18 18 Q. Well, but --
19 19 A. You know what I mean?
20 20 Q. -- at what point in the conversation did
21 21 the money come up? It didn't come up right when he
22 22 walked through the door.
23 23 A. At what point, who knows? I don't know.
24 24 Q. You don't remember?
25 25 A. No.

Bradshaw, Leon 12.1.09 video depo

1 00074:01 Q. All right. Is it fair to say that he
2 02 would have sat down, you would have had a
3 03 conversation, and the money would have come up
4 04 sometime --
5 05 A. Conversation about what?
6 06 Q. What's that?
7 07 A. A conversation about what?
8 08 Q. About anything.
9 09 A. I don't need to talk to him.
10 10 Q. Do you remember --
11 11 A. What would I need to talk to him -- huh?
12 12 Q. But do you remember, sitting here, what
13 13 was discussed?
14 14 A. I never discussed anything with him,
15 15 nothing.
16 16 Q. Well, but you told us --
17 17 A. Zero, zero.
18 18 Q. You told us before that your memory for
19 19 these meetings is not very good, in fact, you told
20 20 Mr. Vilker that an hour from now --
21 21 A. My memory --
22 22 Q. -- you might not recall.
23 23 A. My memory is not -- I'm 73 years old.
24 24 Q. Right.
25 25 A. I only remember what I -- what I need to

Bradshaw, Leon 12.1.09 video depo

1 00075:01 remember.
2 02 Q. Okay.
3 03 A. So what I -- what I need to remember him
4 04 for?
5 05 Q. All right.
6 06 A. He gave me the money, bye, see ya later.
7 07 Q. So what you remember -- what's important
8 08 to you and what you remember from these meetings is
9 09 that Raymour was paying you some money, isn't that
10 10 --
11 11 A. He wasn't paying me, he was giving me
12 12 money.
13 13 Q. Giving you money?
14 14 A. Yeah.
15 15 Q. He was writing out a check to you?
16 16 A. Well, he wrote it out. It was already
17 17 written out.
18 18 Q. Okay. All right. And he gave it to you?
19 19 A. Yeah.
20 20 Q. Okay. And whatever was said was not as
21 21 important to you as what was actually being given to
22 22 you?
23 23 A. The only thing I was interested in, that
24 24 the check was good and I could cash it --
25 25 Q. Right.

Bradshaw, Leon 12.1.09 video depo

1 00076:01 A. -- at Citizens Bank.
2 02 Q. Right.
3 03 A. That's all I was interested in. I
4 04 couldn't care less about anything else because I had
5 05 no reason to care about anything else.
6 06 Q. Okay. And you don't -- you don't deny on
7 07 Exhibit 8 the --
8 08 A. What about Exhibit 8? What about it?
9 09 Q. That's your signature on --
10 10 A. Sure it's my --
11 11 Q. -- the third page --
12 12 A. Sure.
13 13 Q. -- right?
14 14 A. Yeah. It went right down the papers, sign
15 15 here, sign here.
16 16 Q. Okay. And it would have said in bold
17 17 type, "Agreement and Acknowledgment Brokerage
18 18 Account"?
19 19 A. Yeah, if it was on there, probably so. I
20 20 don't know.
21 21 Q. Okay.
22 22 A. Yeah.
23 23 Q. But you didn't pay much attention to it?
24 24 A. I didn't need to.
25 25 Q. Okay. Now, did you -- after -- after you

Bradshaw, Leon 12.1.09 video depo

1 00077:01 were paid -- given the 2 -- the \$4,000 by Raymour --
2 02 A. Yeah.
3 03 Q. -- after you were given that money, that
4 04 was in, according to the check, it was in September
5 05 of 2008?
6 06 A. Yeah.
7 07 Q. Did you ever see Raymour again?
8 08 A. No, I don't think so.
9 09 Q. Did you see him this year?
10 10 A. No.
11 11 Q. You never saw him this year?
12 12 A. I don't think so.
13 13 Q. Well --
14 14 A. I don't remember. I don't remember seeing
15 15 him no more, no.
16 16 Q. So since of September of 2008, did you
17 17 have any contact with Raymour?
18 18 A. No. I don't know. Maybe he called me. I
19 19 don't know.
20 20 Q. All right.
21 21 A. Yeah, he could have called me.
22 22 Q. He could have called you afterwards?
23 23 A. He could have, yeah.
24 24 Q. And do you remember what the conversation
25 25 would have been about?

Bradshaw, Leon 12.1.09 video depo

1 00078:01 A. Well, he just said how was I.
2 02 Q. Okay. He was --
3 03 A. Was I all right, boom --
4 04 Q. -- checking in?
5 05 A. -- see you later.
6 06 Q. Okay. Do you remember how many times he
7 07 called you?
8 08 A. I only remember getting but one call.
9 09 Q. Okay. Do you remember him coming to your
10 10 apartment at all --
11 11 A. No.
12 12 Q. -- this year?
13 13 A. Not to my -- no.
14 14 Q. Okay. We're in December, it's December
15 15 1st. Do you have any memory of him coming to see
16 16 you this past summer?
17 17 A. No. Nobody come to see me, no.
18 18 Q. Okay. Did anybody ever tell you that you
19 19 did anything wrong in any of this?
20 20 A. That I done anything wrong?
21 21 Q. Yeah. Did anybody suggest that to you?
22 22 A. No. If somebody suggested that, that I
23 23 was doing something wrong, I'd never be sitting here
24 24 now.
25 25 Q. Okay. Did you have a meeting with a

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00079:01 member of the Postal Inspector's office, a Mr --

02 A. No.

03 Q. -- Souza? Do you remember meeting with

04 him?

05 A. Well, I don't know. When the postal

06 people came, it's been here recently.

07 Q. Right.

08 A. They told me they were postal people.

09 Q. Okay.

10 A. Yeah.

11 Q. And do you remember who it was?

12 A. I don't know, a couple of guys. Yeah, if

13 I seen them I probably would know them, yeah.

14 Q. Okay. Do you see any of them in the room

15 today?

16 A. There's the one guy there and --

17 Q. Okay.

18 A. -- there was another guy. Was you with

19 him? I don't know. Yeah, he was there.

20 Q. Okay. So Mr. McAdam (sic) and Mr. Souza

21 --

22 A. Now, you see, I know them here and I don't

23 even know their names.

24 MR. PINE: Okay. But those two gentlemen

25 --

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00080:01 THE WITNESS: Yeah.

02 MR. PINE: -- the record will reflect he

03 pointed out Mr. McAdam (sic) and Mr. Souza.

04 THE WITNESS: But I know they was in my

05 house.

06 MR. PINE: Okay.

07 THE WITNESS: That's how my brain is.

08 You're gonna see how my brain is. That's the way it

09 is.

10 MR. PINE: Okay. All right.

11 Q. And they -- they paid you a visit a couple

12 of weeks ago?

13 A. A couple of weeks, a couple of days ago --

14 Q. Okay.

15 A. -- weeks or whatever, yeah.

16 Q. And did they ask you some questions on

17 that day?

18 A. Yeah. Don't ask me what it was because I

19 don't remember.

20 Q. You don't remember what they asked you?

21 A. That's what -- see, in other words, I'm

22 trying to get you to understand how I'm thinking.

23 Q. Right.

24 A. All right. You know, like -- like they

25 come and see me. They said they wanted to talk to

Bradshaw, Leon 12.1.09 video depo

00081:01 me, same way you're talking to me --

02 Q. Right.

03 A. -- all right? So, hey, what did I do, you

04 know what I mean? Nobody said you done nothing

05 wrong.

06 Q. Okay.

07 A. So I could care less. They asked me

08 questions the same way you --

09 Q. Did they -- did they say that anybody did

10 anything wrong?

11 A. Nobody said anything about nobody doing

12 nothing wrong.

13 Q. Okay.

14 A. I still don't know that's somebody's done

15 something wrong.

16 Q. Okay, fair enough.

17 A. Except, except, except that what I'm

18 thinking, you know, that -- that whatever's

19 happening is coming to me, and I'm thinking that

20 from the street, you see.

21 Q. What do you mean coming to you?

22 A. Well, I mean if something's going down,

23 they're trying to dump it on me. That's the way I

24 feel.

25 Q. Well, did they ever say that that was

Bradshaw, Leon 12.1.09 video depo

00082:01 happening?

02 A. They -- they haven't said anything.

03 Q. Well, we haven't said that.

04 A. No, but I'm getting this from the street,

05 man.

06 Q. All right.

07 A. I grew up in the street --

08 Q. All right.

09 A. -- all right? I grew up in the street.

10 When this many people jam -- jam up on me --

11 Q. Right.

12 A. -- something's wrong.

13 Q. Well, did you understand that you are just

14 a witness in a case, that's --

15 A. No, I don't know that.

16 Q. -- all it is?

17 A. I don't --

18 Q. Well, that's why you're being deposed.

19 You're a witness.

20 A. You guys are lawyers and doctors --

21 MR. VILKER: I object to that question.

22 A. Yeah, you guys are lawyers and whatever

23 you are. I'm not in that frame of mind.

24 Q. All right.

25 A. Okay? I'm not -- I don't what you're

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1 00083:01 here. I don't know who you are or what you are.
2 02 And to be honest with you, and I'm not trying to be
3 03 funny, I don't -- I don't really care --
4 04 Q. All right.
5 05 A. -- you know, because it don't make me no
6 06 smarter or no dumber.
7 07 Q. Uh-hum. When you were shown -- I think it
8 08 was Exhibit 2 -- no, it wouldn't have been Exhibit
9 09 2. Hold on. Yeah, Exhibit 2, in the memo section,
10 10 it said "New Account Setup." And I think you told
11 11 Mr. Vilker you couldn't care less what it said on
12 12 the check, what was important to you was the \$4,000.
13 13 Is that --
14 14 A. Two -- two things on there was important
15 15 to me.
16 16 Q. Okay.
17 17 A. The \$4,000 and the Citizens Bank.
18 18 Q. Okay.
19 19 A. The \$4,000 because it represents money,
20 20 the Citizens Bank because I could cash it.
21 21 Q. Okay. And with respect to the documents
22 22 that you were shown, am I correct in thinking that
23 23 you weren't very concerned with the -- with the
24 24 writing on the documents, you were concerned about
25 25 --

Bradshaw, Leon 12.1.09 video depo

1 00084:01 A. I wasn't concerned at all.
2 02 Q. Okay.
3 03 A. You want me to tell you why I wasn't
4 04 concerned? Because I trusted him --
5 05 Q. Okay.
6 06 A. -- you know, as to what was going on was
7 07 okay.
8 08 Q. Right.
9 09 A. All right? I didn't have no reason to be
10 10 concerned.
11 11 Q. Okay.
12 12 A. You know what I mean?
13 13 Q. Right.
14 14 A. If that's makes any sense to you.
15 15 Q. It makes sense.
16 16 A. It's dumb. You know, if I had went to
17 17 college maybe I would have been concerned, I would
18 18 have thought, you know --
19 19 Q. Well --
20 20 A. -- but I'm not -- I'm not living in your
21 21 world.
22 22 Q. I guess -- I guess my question --
23 23 A. You know.
24 24 Q. My question is, as I asked you earlier, he
25 25 never prevented you from asking questions, he never

Bradshaw, Leon 12.1.09 video depo

1 00085:01 prevented you from reading the documents if you
2 02 wanted to or if you chose to --
3 03 A. I had --
4 04 Q. -- am I right?
5 05 A. I had -- you're right.
6 06 Q. All right.
7 07 A. But I had no reason to ask questions.
8 08 Q. Okay.
9 09 A. Give me one good reason why I should ask a
10 10 question.
11 11 Q. And you don't know to what extent he
12 12 talked to you about these documents because your
13 13 memory from those meetings is not very clear?
14 14 A. If any extent.
15 15 Q. Right. You don't know one way or the
16 16 other?
17 17 A. I don't even know if he talked to me to
18 18 any extent.
19 19 Q. Okay.
20 20 A. You know what I mean so --
21 21 Q. He might have, you don't remember?
22 22 A. Anything is possible, man. Anything is
23 23 possible --
24 24 Q. All right.
25 25 A. -- I mean if you want to talk that way,

Bradshaw, Leon 12.1.09 video depo

1 00086:01 you know?
2 02 MR. PINE: Okay. Do you need to take a
3 03 break?
4 04 THE WITNESS: No.
5 05 MR. PINE: Okay.
6 06 THE WITNESS: I'm just putting this on,
7 07 that's all. I'm all right.
8 08 MR. PINE: All right. I just want to make
9 09 sure.
10 10 THE WITNESS: I get to coughing a little
11 11 when I...
12 12 Q. And as we sit here today, do you remember
13 13 how many times you met with him in 2008 --
14 14 THE WITNESS: With Raymour?
15 15 Q. -- the total number of times?
16 16 THE WITNESS: With Raymour?
17 17 MR. PINE: With Raymour, yeah.
18 18 A. No. To -- to -- to really say and be
19 19 honest about it how many times we met, no, but I --
20 20 but I can remember three times that we met.
21 21 Q. Three, okay.
22 22 A. Yeah. I mean I'm not saying that's how
23 23 many times we met, I'm saying I remember three times
24 24 that I can honestly say we met.
25 25 Q. Okay. Three in '08 and none, as far as

Bradshaw, Leon 12.1.09 video depo

1 00087:01 you can remember, in '09?
2 02 A. Right.
3 03 MR. PINE: Okay. If I can just have a
4 04 minute.
5 05 Q. Do you have any -- I'm showing you Exhibit
6 06 3 and Exhibit 8 --
7 07 A. Right.
8 08 Q. -- which appear to be the same --
9 09 A. Yeah.
10 10 Q. -- typed-out documents.
11 11 A. Yeah.
12 12 Q. Any idea why your signature is on both and
13 13 one is filled out and one is not? Do you have any
14 14 explanation for that?
15 15 A. I have no idea, no.
16 16 Q. Do you remember signing Exhibit 3?
17 17 A. When I signed those exhibits, all that
18 18 wasn't on there.
19 19 Q. Okay. It's your signature?
20 20 A. Yeah, that's my signature.
21 21 Q. But you don't know if you signed Exhibit 3
22 22 in '08 or '09, do you?
23 23 A. There's other -- are these the same --
24 24 same things?
25 25 Q. Well, you can look at them.

Bradshaw, Leon 12.1.09 video depo

1 00088:01 A. No, no, I'm not questioning you, I'm
2 02 asking you --
3 03 Q. Right.
4 04 A. -- are these the same thing. All right.
5 05 Are they both signed?
6 06 Q. They're both signed but it looks like --
7 07 A. I don't know -- I don't know which is
8 08 which, so if I signed two of them, I don't know.
9 09 Q. Okay.
10 10 A. I can't -- I can't tell you that because I
11 11 don't know. I just signed.
12 12 Q. Okay.
13 13 A. I could have signed two of them. I don't
14 14 know, you know.
15 15 Q. And you don't have any memory of seeing
16 16 Raymour this year about that?
17 17 A. If I seen Raymour right at this table, I
18 18 wouldn't know him if I seen him.
19 19 Q. Well, is he sitting at this table?
20 20 A. Oh, that's Raymour.
21 21 Q. Right.
22 22 A. Yeah, but I was thinking about the other
23 23 guy that you mentioned. What was the other guy you
24 24 mentioned? You mentioned another guy. I forget his
25 25 name.

Bradshaw, Leon 12.1.09 video depo

1 00089:01 Q. Don't know.
2 02 A. I'll hear it again. I'll know who it is.
3 03 Q. Other than today, put today to the side,
4 04 and other than the time that you met with the postal
5 05 inspector --
6 06 A. Right.
7 07 Q. -- and the attorney for the -- for the
8 08 Government --
9 09 A. Uh-hum.
10 10 Q. -- did you ever meet with anybody else to
11 11 talk about these things --
12 12 A. No.
13 13 Q. -- these topics?
14 14 A. No. They're the first guys that I met.
15 15 Q. Okay.
16 16 A. Yeah.
17 17 Q. So you don't have any memory of meeting
18 18 with anybody else other than --
19 19 A. No.
20 20 Q. -- what we've talked about?
21 21 A. Those two guys are the only guys I met
22 22 with, you know.
23 23 Q. Okay. Before that, were you ever -- were
24 24 you ever visited by anybody else --
25 25 A. No.

Bradshaw, Leon 12.1.09 video depo

1 00090:01 Q. -- to talk about this?
2 02 A. No.
3 03 Q. Okay. And I think you said -- I think you
4 04 said earlier that this was never that big a deal to
5 05 you --
6 06 A. No.
7 07 Q. -- until --
8 08 A. Until money was mentioned.
9 09 Q. Until the money was mentioned, right.
10 10 A. Yeah.
11 11 Q. And even after the money was mentioned,
12 12 you didn't give it another -- another -- another
13 13 thought, did you?
14 14 A. Well, I -- I gave it a thought as to
15 15 whether I was gonna get any or not, yeah.
16 16 Q. Right. When Raymour spoke to you, you
17 17 said that he called once that you remember?
18 18 A. Yeah. That I remember, yeah.
19 19 Q. Did the subject of more money or other
20 20 programs come up in that discussion over the phone?
21 21 A. Yeah. Well, yeah, there might be more
22 22 money or more programs, yeah.
23 23 Q. Right.
24 24 A. Yeah.
25 25 Q. What did he -- what do you remember him

Bradshaw, Leon 12.1.09 video depo

00091:01 saying about that?

02 A. Well, I don't know. He said a few things

03 but -- but the only thing I got out of that was

04 maybe there was another program that was giving more

05 money or whatever.

06 Q. Not just -- not just the programs that you

07 were involved in already but there might be

08 something else?

09 A. Another program, yeah.

10 Q. Okay.

11 A. Yeah, yeah. So naturally that represents

12 money so, yeah, I'm interested.

13 Q. Right. So you told him that you were

14 interested?

15 A. Sure.

16 Q. Okay.

17 A. Yeah.

18 Q. And how did you leave it with him after he

19 told you that there might be another program that

20 you could --

21 A. Well, I left it --

22 Q. -- get involved with?

23 A. I left it -- I left it that maybe he'd get

24 in touch -- that he'd get in touch with me if that

25 was, you know, if that happens, you know.

Bradshaw, Leon 12.1.09 video depo

00092:01 Q. Okay. When he called you, did he say, "I

02 think I may have another program that you might be

03 interested in"?

04 A. No. He didn't say that to me, no.

05 Q. Words to that effect or --

06 A. No. I don't know what he said to me but

07 it wasn't nothing like that, no, no.

08 Q. All right. But he talked about another

09 program and some money that might be available?

10 A. Well, you see, I don't know the exact

11 words he said but --

12 Q. Right.

13 A. -- but, yeah, that the \$4,000, that's when

14 the 4,000 came through, yeah.

15 Q. Right.

16 A. That's -- yeah.

17 Q. Right. That was after the initial \$2,000?

18 A. Yeah.

19 Q. And when he called you afterwards, after

20 the 4,000 had been paid --

21 A. Yeah.

22 Q. -- he called you at least once afterwards

23 that you remember?

24 A. He just asked me was I all right, that's

25 all.

Bradshaw, Leon 12.1.09 video depo

00093:01 Q. And did he talk about additional money at

02 that time?

03 A. No, no. No additional money, no.

04 Q. Okay.

05 A. If he did, I didn't hear it.

06 Q. You still -- you still have contact with

07 Cathy? Is she -- is she still your --

08 A. Cathy's my nurse.

09 Q. Right.

10 A. Yeah.

11 Q. After you met with Raymour on the times

12 that you did --

13 A. Yeah.

14 Q. -- you said that you trusted him, correct?

15 A. Well, yeah, I had no reason not to.

16 Q. Right. Did you tell her that you had a

17 favorable opinion about him?

18 A. No. I didn't tell her anything. I told

19 her -- if it was a favorable opinion, it would have

20 been about her. It would have been towards her.

21 Q. Right. Why?

22 A. Why? Because I knew her.

23 Q. Oh, okay. What about -- did you ever have

24 a discussion with Cathy about Raymour?

25 A. Well, yeah, yeah. Well, not a discussion,

Bradshaw, Leon 12.1.09 video depo

00094:01 like you would think a discussion.

02 Q. Right.

03 A. My -- my thing with her was where was this

04 money coming from?

05 Q. And after you met with Raymour, did you

06 ever tell her that it went -- went pretty well, you

07 got paid \$6,000?

08 A. No. That wasn't -- you know -- you know,

09 when you come to me with \$6,000, and I'm gonna say

10 this to you and I know it's gonna sound crazy to

11 you, but \$6,000 ain't no money, man. All that is is

12 -- not to a guy like me. 6,000 -- you know what I

13 done with the \$6,000? See these pants I got on?

14 They're \$100 apiece.

15 Q. Uh-hum.

16 A. When I went down there, I bought pants

17 like this, \$100 apiece. \$6,000 is no -- no money.

18 I bought 50, \$100 shirts. \$6,000 go in two minutes,

19 you know, so -- so that -- that to me was nothing,

20 so I -- I'm not at all jumping up in the air --

21 Q. No, I understand.

22 A. -- over \$6,000.

23 Q. I'm just -- I'm just -- I understand that.

24 I'm just wondering did you ever talk to Cathy --

25 A. No, no.

Bradshaw, Leon 12.1.09 video depo

1 00095:01 Q. -- and express the fact that --
2 02 A. The only thing -- the only thing that I --
3 03 I talked to Cathy was it was more or less trying to
4 04 get things out of Cathy about what's going on.
5 05 Q. Uh-hum.
6 06 A. You know what I mean? Like if you come to
7 07 me and you introduce me to something, two guys, I
8 08 want to find out from you what are these guys about.
9 09 Q. Right.
10 10 A. So I'm trying to get it from you. That --
11 11 that was my conversation with Cathy.
12 12 Q. All right. And did she tell you when you
13 13 asked her?
14 14 A. She didn't actually tell me because I
15 15 don't think she knew.
16 16 Q. Okay.
17 17 A. Cathy didn't know what to tell me. She
18 18 don't know. So -- so, you know, so what I -- I mean
19 19 she convinced me enough that everything was legit,
20 20 everything was okay.
21 21 Q. Uh-hum.
22 22 A. And so I -- that's how I left it.
23 23 Q. Okay.
24 24 A. You know, because, you know, Cathy, she --
25 25 she never done nothing wrong. She's been good to

Bradshaw, Leon 12.1.09 video depo

1 00096:01 me, you know. And she kept saying -- the thing that
2 02 -- the thing that really stayed in the back of my
3 03 mind was there was seven or eight more people. You
4 04 know, I was on the end of --
5 05 Q. Right.
6 06 A. -- seven or eight more people. I wasn't
7 07 the only --
8 08 Q. Did she tell you that or did Raymour tell
9 09 you that or did both?
10 10 A. Oh, no, everybody. Everybody said --
11 11 Q. Right.
12 12 A. -- you know, I was lucky to get in on it.
13 13 Q. Right. And that's how you felt?
14 14 A. And that's how I felt. I was lucky to get
15 15 in on this thing, you know.
16 16 Q. So you were glad --
17 17 A. They're running out -- oh, yeah, he did
18 18 say one thing, I just thought about it, that they
19 19 were running out of money.
20 20 Q. Okay.
21 21 A. Yeah. That came to me just like that.
22 22 Q. And you were one of the last ones to get
23 23 this --
24 24 A. I was one of the last ones.
25 25 Q. -- benefit?

Bradshaw, Leon 12.1.09 video depo

1 00097:01 A. They were running out of money.
2 02 Q. Okay.
3 03 A. And that's why they were rounding the
4 04 figures off.
5 05 Q. And you were glad about that?
6 06 A. Sure I want a piece of it. Yeah, don't
7 07 let me out.
8 08 Q. Okay.
9 09 A. Sure.
10 10 Q. You weren't -- you weren't arguing with
11 11 them?
12 12 A. No, I'm not arguing. You put some. You
13 13 give me some --
14 14 Q. Okay.
15 15 A. -- and I'll take that too, as long as you
16 16 don't wanna cut me up and take my life and take all
17 17 that, I -- yeah, sure.
18 18 Q. And he clearly didn't want to do that.
19 19 A. Yeah, well, I mean I'm telling you like it
20 20 is.
21 21 MR. PINE: Thank you. I have nothing
22 22 further.
23 23 THE VIDEOGRAPHER: The time is now 2:25.
24 24 We are now off the record.
25 25 (Off the record.)

Bradshaw, Leon 12.1.09 video depo

1 00098:01 THE VIDEOGRAPHER: The time is now 2:26.
2 02 We are now back on the record.
3 03 EXAMINATION
4 04 BY MR. FLANDERS:
5 05 Q. Hi, Mr. Bradshaw.
6 06 A. Hey.
7 07 Q. My name is Bob Flanders and I represent
8 08 Mr. Caramadre.
9 09 A. Yeah, how you doing?
10 10 Q. Good. How are you?
11 11 A. All right.
12 12 Q. You've mentioned that you trusted Raymour;
13 13 is that right?
14 14 A. Sure.
15 15 Q. Why did you trust him?
16 16 THE WITNESS: Why?
17 17 MR. FLANDERS: Uh-hum.
18 18 A. Well, when you say trust, man, you know,
19 19 you're putting that in a broad sense of trust. I
20 20 wouldn't trust him that way. I mean when you say
21 21 trust him, trust him in what, you know what I mean?
22 22 In other words, I trust him to wherein I don't think
23 23 he's doing nothing wrong to me.
24 24 Q. And do you still -- still hold that
25 25 opinion?

Bradshaw, Leon 12.1.09 video depo

1 00099:01 A. Do I hold that? Well, I don't know him.
2 02 He don't know me. I never done nothing to him.
3 03 Q. Has he ever done anything wrong to you?
4 04 A. No.
5 05 MR. VILKER: Objection.
6 06 A. No. I never done nothing to him. Why
7 07 shouldn't I trust him, right? What is he gonna do,
8 08 you know, why should he do something to me?
9 09 Q. All right. And when he came to you and
10 10 gave you the money and -- and you cashed the check
11 11 the first time for \$2,000, you saw that he lived up
12 12 to what he said he would do, right?
13 13 A. Yeah.
14 14 Q. And then you had a further meeting with
15 15 him where you saw there was a possibility of -- of
16 16 making even more money; is that right?
17 17 A. Yeah.
18 18 Q. And now when you met with him that second
19 19 time, he asked you to sign certain documents?
20 20 A. He had documents to sign, yeah.
21 21 Q. And were you willing to sign those
22 22 documents to get the additional money?
23 23 A. Well, sure, after he said this, this, this
24 24 and this, he ran through something real fast to me,
25 25 yeah, yeah.

Bradshaw, Leon 12.1.09 video depo

1 00100:01 Q. Okay. And you told us that he talked to
2 02 you about what the documents were for?
3 03 A. Hey, when you say talked to me and what
4 04 they were for, if that's what you call talking to me
5 05 what they were for, boom, boom, boom, boom, bang,
6 06 sign here, all right.
7 07 Q. But he did -- he did make some statements
8 08 about the documents, didn't he?
9 09 A. He might have said a few words.
10 10 Q. Okay.
11 11 A. A few words. Very few, yeah.
12 12 Q. Right. But as you told us earlier, you
13 13 don't remember what those words were --
14 14 A. Not all of them.
15 15 Q. -- because you were focused on the money?
16 16 A. Not all of them, no.
17 17 Q. You don't remember any of them?
18 18 A. Well, no, no. Not -- not -- not what --
19 19 not what's going on here, no, no.
20 20 Q. All right. So, you know, let's just take
21 21 a look at some of these documents for a minute.
22 22 Take a look at Exhibit 8, if you would. This is the
23 23 document that you signed on Page 3 --
24 24 A. Yeah.
25 25 Q. -- that says, "Agreement and

Bradshaw, Leon 12.1.09 video depo

1 00101:01 Acknowledgement"?
2 02 A. Yeah.
3 03 Q. Is this what the document looked like when
4 04 you signed it?
5 05 A. Yeah, I guess so. That one right there.
6 06 Q. So everything that's on Exhibit 8 was
7 07 there when you were asked to sign it; is that right?
8 08 A. Well, I guess so.
9 09 MR. VILKER: Objection.
10 10 A. I didn't even look at it. I didn't even
11 11 -- didn't read it. Didn't even read it.
12 12 Q. Is this one of the documents that Raymour
13 13 asked you to sign?
14 14 A. Well, I think so. That's my signature.
15 15 Q. All right. And did he tell you about why
16 16 he was asking you to sign this?
17 17 A. No. Not really, no.
18 18 Q. Did you understand that to get the money
19 19 you had to sign the documents that Raymour was
20 20 presenting to you?
21 21 A. No, no.
22 22 Q. In fact, didn't he present you with the
23 23 documents --
24 24 A. I knew -- I knew --
25 25 Q. -- before -- before -- let me finish.

Bradshaw, Leon 12.1.09 video depo

1 00102:01 Didn't he present you with the documents before he
2 02 gave you the check for \$4,000 and asked you to sign
3 03 them?
4 04 A. Well, yeah, yeah.
5 05 Q. And you were willing to do that, weren't
6 06 you?
7 07 A. Sure.
8 08 Q. You were willing to sign the documents
9 09 that Raymour presented to you so you could get your
10 10 money?
11 11 A. Right, yeah.
12 12 Q. And you didn't even really care what was
13 13 in the documents?
14 14 A. Well, sure I cared.
15 15 Q. Well, did you --
16 16 A. Sure, you care.
17 17 Q. Did you read what was in the documents?
18 18 A. There's nothing to read. When you -- when
19 19 -- when -- when the guy tell you to sign here, sign
20 20 here, sign here, it's all right, sign here, sign
21 21 here, what do I need to -- what do I need to read?
22 22 Q. Well, did you read in paragraph 1 where
23 23 you are going to be a co-owner in a joint account
24 24 with him?
25 25 A. No, no, no. That didn't -- that didn't

Bradshaw, Leon 12.1.09 video depo

1 00103:01 even -- that's as far away as from what went on with
2 02 me.
3 03 Q. Right.
4 04 A. That's as far away from what actually
5 05 happened as you can get.
6 06 Q. Well, how far away is it when your
7 07 signature is on a line that says "Co-Owner"?
8 08 A. I didn't even -- no, I didn't think about
9 09 that. Didn't even think about that.
10 10 Q. You didn't think about it --
11 11 A. Didn't see it.
12 12 Q. -- but it was --
13 13 A. Didn't even see it.
14 14 Q. But you don't deny that it was there, do
15 15 you?
16 16 A. You wanna know something, you wanna know
17 17 something, you wanna know something, you wanna know
18 18 something. This don't even have to be the paper
19 19 that I signed, you know what I mean? This, this
20 20 right here, I don't even see this. I don't even see
21 21 it. I'm just signing papers, two or three papers
22 22 I'm signing.
23 23 Q. I understand that but you don't deny that
24 24 that lettering was there that says "Co-Owner's
25 25 Signature" when you signed it, do you?

Bradshaw, Leon 12.1.09 video depo

1 00104:01 A. No, that's my signature.
2 02 Q. Do you deny that was there?
3 03 A. I don't know. I don't even know if this
4 04 was the paper.
5 05 Q. Well, you --
6 06 A. I don't deny it. I don't know nothing. I
7 07 don't even know if it was there.
8 08 Q. All right.
9 09 A. I mean I'm all excited. I'm signing. I
10 10 don't really see it.
11 11 Q. Well, were you willing to be a co-owner on
12 12 an account to get your money?
13 13 A. No. I'm gonna -- I'm gonna want to ask
14 14 more about that. If I'm -- if that's coming down,
15 15 I'm gonna ask Raymour more about that and I'm gonna
16 16 -- I'm gonna want to know more about what's going on
17 17 with that, okay?
18 18 Q. Has it cost you any money to be a co-owner
19 19 in this account?
20 20 THE WITNESS: Has it cost me any money?
21 21 MR. FLANDERS: Yeah.
22 22 A. No. It never cost me nothing, no, no.
23 23 Q. In fact, after you signed this document
24 24 agreeing to become a co-owner, you were paid
25 25 \$4,000 --

Bradshaw, Leon 12.1.09 video depo

1 00105:01 A. Yeah.
2 02 Q. -- is that right?
3 03 A. Yeah.
4 04 Q. And you were also paid \$4,000 after you
5 05 signed these other documents that Raymour presented
6 06 to you, right?
7 07 A. Yeah, yeah.
8 08 Q. And one of them was a document entitled,
9 09 "Complete Investment Account Application"?
10 10 A. Yeah. We see all of that, yeah. I don't
11 11 know. That's the first, you pointing that out to
12 12 me. Go ahead.
13 13 Q. And when you signed this document --
14 14 A. Yeah.
15 15 Q. -- and put your signature on this page
16 16 here, you did it over a line that says, "Signature
17 17 of Co-Account Owner;" is that right?
18 18 A. I don't even see it, don't even know it,
19 19 just sign here, sign here, sign here, all the x's,
20 20 sign here.
21 21 Q. I know you're telling us, sir, that you
22 22 didn't see it, but you don't deny that that was
23 23 there when you signed it, do you?
24 24 A. I don't know if it was there. I didn't
25 25 pay no attention to it. I don't know.

Bradshaw, Leon 12.1.09 video depo

1 00106:01 Q. So it didn't matter to you?
2 02 A. Didn't matter at all, no.
3 03 Q. Okay.
4 04 A. Didn't matter.
5 05 Q. And when Mr. Vilker asked you whether you
6 06 wrote in that date of 8-13-2008 --
7 07 A. Yeah.
8 08 Q. -- and you told him you didn't --
9 09 A. No, I didn't write that.
10 10 Q. -- but isn't that at or about the time
11 11 when you signed it?
12 12 A. Could have been. I don't know.
13 13 Q. So you don't deny that you signed it
14 14 sometime --
15 15 A. I don't -- I don't deny anything. Even
16 16 the stuff that I don't know I don't deny.
17 17 Q. Okay.
18 18 A. Because if I don't know it, how can I deny
19 19 it? I don't know.
20 20 Q. So you don't know, as you sit here,
21 21 whether, in fact, you signed this on or about August
22 22 13th, 2008; you just don't know?
23 23 A. I don't know, right. I know one thing, I
24 24 know the day that I cashed that check.
25 25 Q. Okay.

Bradshaw, Leon 12.1.09 video depo

1 00107:01 A. We know that day.
2 02 Q. And what's that day?
3 03 A. Well, I don't know. It's on the check.
4 04 The bank's got it. It's no problem. I can always
5 05 go to the bank and find that out.
6 06 Q. Now, I'm going to show you Exhibit 5,
7 07 which is a document entitled, "Options Trading
8 08 Application."
9 09 A. Yup.
10 10 Q. And this is another document with your
11 11 signature on it.
12 12 A. Yeah, I know.
13 13 Q. It says, "Signature of Co-Account Holder."
14 14 A. Right.
15 15 Q. Now, was this the document that was shown
16 16 to you that you signed before you got your \$4,000,
17 17 or one of them?
18 18 A. That's my signature on there.
19 19 Q. Okay. But was this the document?
20 20 A. I don't know. It could have been, yeah.
21 21 I don't know.
22 22 Q. All right.
23 23 A. I don't know for sure if it was or not.
24 24 Q. So I mean when you signed it, did the
25 25 document have "Options Trading Application" --

Bradshaw, Leon 12.1.09 video depo

1 00108:01 A. I don't know.
2 02 Q. -- in block letters at the top?
3 03 A. I have no idea. All I -- all I'm doing is
4 04 looking for the "x."
5 05 Q. Okay.
6 06 A. I'm going down the paper like this.
7 07 Q. All right. And was --
8 08 A. Like that.
9 09 Q. Before you signed this, did Raymour talk
10 10 to you about these documents?
11 11 A. Not the way you're talking. Not about
12 12 what you're talking about.
13 13 Q. But he -- he asked you to sign them and
14 14 you understood you had to sign them to get the
15 15 money?
16 16 A. He told me to sign these documents, that's
17 17 all.
18 18 Q. And --
19 19 A. You're saying it -- what you're saying to
20 20 me is that he's telling me that I gotta sign
21 21 documents to get money, but that's not the way it
22 22 was.
23 23 Q. Well, did --
24 24 A. He's just telling me sign -- sign the
25 25 documents. I'm going boom, sign documents, boom.

Bradshaw, Leon 12.1.09 video depo

1 00109:01 Q. But --
2 02 A. And he handed me a check.
3 03 Q. But you --
4 04 A. That's the end of the conversation.
5 05 That's the way it was.
6 06 Q. But you were willing to sign the documents
7 07 to get your money?
8 08 A. Sure I signed them for the money. Sure I
9 09 would.
10 10 Q. And you were also willing to give Raymour
11 11 certain information about yourself to get the money?
12 12 A. Like what?
13 13 Q. Like your Social Security number?
14 14 A. I don't --
15 15 Q. Like your mother's maiden name?
16 16 A. I don't give him my Social Security.
17 17 Q. All right. Take a look at this for a
18 18 second.
19 19 A. I see it on there. I see that on there.
20 20 THE WITNESS: What's this?
21 21 MR. FLANDERS: This is a document that I
22 22 want to have marked as Exhibit D.
23 23 (Whereupon, Defendants' Exhibit D was
24 24 marked for identification.)
25 25 Q. Now, this is a document that has certain

Bradshaw, Leon 12.1.09 video depo

1 00110:01 information about you on it; is that right?
2 02 THE WITNESS: What's all this stuff here?
3 03 What is that in there? What's that say? Can you
4 04 make that out?
5 05 MR. FLANDERS: It looks like --
6 06 THE WITNESS: Can you make -- right there.
7 07 MR. FLANDERS: -- mother's -- Lillie --
8 08 THE WITNESS: That right there.
9 09 MR. FLANDERS: Lillie Ragland.
10 10 THE WITNESS: No. What does that say right
11 11 there?
12 12 MR. FLANDERS: It's crossed out. I don't
13 13 know.
14 14 THE WITNESS: You wanna know something? I
15 15 don't know what it is either.
16 16 Q. Is your mother's name Lillie Ragland?
17 17 A. No. That wasn't my mother's name.
18 18 Q. That's not your mother's name?
19 19 A. No.
20 20 Q. Do you know who that is?
21 21 A. I don't know who this is. My mother is
22 22 Lillie Bradshaw.
23 23 Q. Was her maiden name Ragland?
24 24 A. Her mother's name was Ragland.
25 25 Q. Her mother's name?

Bradshaw, Leon 12.1.09 video depo

1 00111:01 A. Yeah.

2 02 Q. So if her mother's name was Ragland --

3 03 A. But this name is all --

4 04 Q. -- that would be her maiden name; isn't

5 05 that right?

6 06 A. This name is all screwed up. Yeah, but

7 07 this name is all screwed up, man. What's that in

8 08 here?

9 09 Q. Did -- did you tell Raymour that your

10 10 mother's maiden name was Ragland?

11 11 A. I don't tell him nothing like this.

12 12 Nothing, period, period.

13 13 Q. Is this accurately --

14 14 A. And this is pissing me off and I'm gonna

15 15 tell you why, because you got some names and a whole

16 16 lot of bullshit in here that ain't even true. It

17 17 ain't even -- nothing I see --

18 18 Q. What's not true?

19 19 A. Well, this. What is that? I'm asking you

20 20 what it is. Tell me what it is.

21 21 Q. I'm telling you it's a crossed-out

22 22 reference so I don't know what it is. I'm asking

23 23 you is that your mother's name, Ragland?

24 24 A. That's not my mother's name, no.

25 25 Q. I thought you just told us that that was

Bradshaw, Leon 12.1.09 video depo

1 00112:01 your mother's --

2 02 A. My mother's name was Lillie Bradshaw.

3 03 That's my --

4 04 Q. What was her name before she was married?

5 05 A. Ragland was her last name.

6 06 Q. Okay. So her name was --

7 07 A. But --

8 08 Q. Was Lillie her first name?

9 09 A. Yeah. But what's that got to do with my

10 10 mother's name?

11 11 Q. Well, I'm asking you was Lillie her first

12 12 name?

13 13 A. Yeah.

14 14 Q. So her name was Lillie Ragland?

15 15 A. Yeah, but what is that? What is that?

16 16 Q. I'm -- that's -- that's --

17 17 A. You would have to put that in there to

18 18 have a name, man.

19 19 Q. Yeah. It says Lillie Ragland.

20 20 A. You don't just say Lillie Ragland and

21 21 that's her name. That's not my mother's name.

22 22 Q. Did you tell Raymour that your mother's

23 23 name -- maiden name, was Lillie Ragland?

24 24 A. No, no, no, no, you know.

25 25 Q. Okay. Is your date of birth [REDACTED]

Bradshaw, Leon 12.1.09 video depo

1 00113:01 [REDACTED]

2 02 A. Yeah.

3 03 Q. Did you tell Raymour that?

4 04 A. Maybe I did, yeah.

5 05 Q. Did you tell him what your Social Security

6 06 number was?

7 07 A. I don't think so.

8 08 Q. Did you give him your driver's license?

9 09 A. Yeah. I could have done that, yeah.

10 10 Q. And -- and that has certain information

11 11 about you on the driver's license?

12 12 A. Yeah. I gave him the driver's. I gave

13 13 him the driver's, yeah, I did do that, yeah.

14 14 Q. So you were willing to give him

15 15 identifying information about yourself?

16 16 A. I gave him what he asked me for, yeah.

17 17 Q. Okay. Whatever he asked you about your

18 18 identity, you gave it to him?

19 19 A. About me, yes.

20 20 Q. Yeah. And you were willing to do that?

21 21 A. Yeah.

22 22 Q. And you were willing to have him take that

23 23 identifying information and -- and -- and use it for

24 24 his purposes?

25 25 MR. VILKER: Objection.

Bradshaw, Leon 12.1.09 video depo

1 00114:01 A. No, no, no, no. See, yeah, I see what

2 02 you're doing but no, that's not true at all, no.

3 03 Q. Didn't he tell you he needed that --

4 04 A. That's not true.

5 05 Q. Did he --

6 06 A. You forget about that. It's just not

7 07 true.

8 08 Q. Did he ask you for the identifying

9 09 information --

10 10 A. That's not true.

11 11 Q. -- that you gave him?

12 12 A. That's not true, see, because I'm gonna

13 13 ask you what was his purpose to see --

14 14 Q. Did he ask you for the identifying

15 15 information you gave him?

16 16 A. No, no. Yeah, he asked me for it, yeah,

17 17 Q. And did he walk out of the room with it?

18 18 A. No. He didn't walk out of the room with

19 19 it, no.

20 20 Q. Did he leave your presence with it?

21 21 A. No.

22 22 Q. Well, did he leave it behind?

23 23 A. He gave it to me back.

24 24 Q. He gave you the driver's license back but

25 25 he kept the information, right?

Bradshaw, Leon 12.1.09 video depo

1 00115:01 A. I think he did, yeah.
 2 02 Q. Yeah. And you knew he kept the
 3 03 information and used it?
 4 04 A. It didn't bother me. Why --
 5 05 Q. I know it didn't bother you because you
 6 06 were --
 7 07 A. Why should it bother me?
 8 08 Q. It didn't bother you because he was paying
 9 09 you to --
 10 10 A. For what?
 11 11 Q. -- for -- to give you --
 12 12 A. He was paying me for my -- for my -- for
 13 13 that information.
 14 14 Q. For the information so he could use it and
 15 15 put it on the documents.
 16 16 A. I've got a --
 17 17 MR. VILKER: Objection.
 18 18 A. I've got a question for you. Why was he
 19 19 -- why was he -- why did he want it? That's my
 20 20 question to you.
 21 21 Q. Well, did he tell you why he wanted it?
 22 22 A. The documents that I know nothing about.
 23 23 Q. Didn't he tell you why he wanted to do it?
 24 24 A. No, no, no, no. That's what's pissing me
 25 25 off with you.

Bradshaw, Leon 12.1.09 video depo

1 00117:01 THE REPORTER: Sorry. Could you re --
 2 02 could you speak one at a time, please.
 3 03 THE WITNESS: Go ahead.
 4 04 Q. Did you -- did Cathy mention to you a
 5 05 lawyer for Hospice named Jeffrey Chase-Lubitz?
 6 06 A. No.
 7 07 Q. Now, the documents that you signed for
 8 08 Raymour, six or seven of them I think you told us,
 9 09 did you ever ask him to provide you with copies of
 10 10 those?
 11 11 A. No. I don't want no copies. What do I
 12 12 need them for?
 13 13 Q. So you didn't even want copies?
 14 14 A. What would I need them for?
 15 15 Q. I don't know but I'm just finding --
 16 16 asking you if you ever asked him for copies.
 17 17 A. I didn't ask him for nothing. I didn't
 18 18 even think I needed them.
 19 19 THE WITNESS: After we finish this, can we
 20 20 take the time so I can go to the bathroom?
 21 21 MR. FLANDERS: Oh, absolutely. You can do
 22 22 it right now. Why don't you do that.
 23 23 THE WITNESS: No, I'll wait for you.
 24 24 MR. FLANDERS: Okay. But if you want to
 25 25 take a break, that's -- we're happy to do that.

Bradshaw, Leon 12.1.09 video depo

1 00116:01 MR. FLANDERS: Well, that's your problem,
 2 02 sir.
 3 03 THE WITNESS: It ain't my problem. It's
 4 04 not my problem. I don't have a problem. I should
 5 05 have been a lawyer, that's what I should have been.
 6 06 Q. Now, this nurse, Cathy, is she a Hospice
 7 07 nurse?
 8 08 THE WITNESS: Hospice?
 9 09 MR. FLANDERS: Yeah.
 10 10 A. I don't know, man. Cathy -- you would
 11 11 have to ask Cathy about what she is and what she's
 12 12 not. The only thing I know about is her being a
 13 13 nurse. I'm not gonna speak for Cathy. Let Cathy
 14 14 speak for herself.
 15 15 Q. Did she -- did Cathy mention to you a
 16 16 lawyer for Hospice named Jeffrey Chase-Lubitz?
 17 17 A. I don't know. You -- you ask Cathy them
 18 18 questions. I'm not gonna say nothing about Cathy.
 19 19 Let Cathy answer her own questions.
 20 20 Q. Well, I'm asking you --
 21 21 A. I don't --
 22 22 Q. -- did Cathy mention to you a lawyer --
 23 23 A. I'm -- I'm talking about --
 24 24 Q. -- from Hospice named Jeffrey
 25 25 Chase-Lubitz?

Bradshaw, Leon 12.1.09 video depo

1 00118:01 THE WITNESS: I've just got to -- I have to
 2 02 do a stool. I've gotta do a poo-poo.
 3 03 MR. FLANDERS: Well, I mean --
 4 04 THE WITNESS: Go ahead. I'll give it a
 5 05 quick -- I'll try to hold on for a minute.
 6 06 MR. FLANDERS: Okay. Believe me, that's
 7 07 the last thing I'd want to happen here.
 8 08 THE WITNESS: But I don't want it to come.
 9 09 You see me squirming. That's why I'm -- I'm not
 10 10 squirming 'cuz I'm nervous, I'm squirming because
 11 11 I've gotta go and do a stool. That's what I'm
 12 12 saying. Let me do that real fast, all right?
 13 13 MR. FLANDERS: Please.
 14 14 THE VIDEOGRAPHER: Do you have more than 20
 15 15 minutes of questions?
 16 16 MR. FLANDERS: Pardon me?
 17 17 THE VIDEOGRAPHER: Do you have more than 20
 18 18 minutes of questions?
 19 19 MR. FLANDERS: I don't think so.
 20 20 THE VIDEOGRAPHER: Are you the last person?
 21 21 MR. FLANDERS: I believe so.
 22 22 THE VIDEOGRAPHER: Okay. I'll just go off
 23 23 the record.
 24 24 THE WITNESS: Go ahead, I'll try to make
 25 25 it.

Bradshaw, Leon 12.1.09 video depo

1 00119:01 THE VIDEOGRAPHER: No, no, no. The time is
2 02 now 2:42. We are now off the record
3 03 (Recess)
4 04 THE VIDEOGRAPHER: The time is it now 2:53.
5 05 We are now back on the record.
6 06 BY MR. FLANDERS:
7 07 Q. Showing you, Mr. Bradshaw, Exhibit 6, this
8 08 is one of the documents that you identified that you
9 09 signed for Raymour. Do you remember that?
10 10 A. Yeah, I remember that. I remember that
11 11 name, yeah.
12 12 Q. Okay. The name being the E*Trade
13 13 Financial?
14 14 A. Yeah. Just -- yeah, see I remember, all
15 15 that there is what I remember.
16 16 Q. Okay.
17 17 A. It jumps out at me.
18 18 Q. Did this document look the way it now
19 19 looks or were there any differences when you signed
20 20 it?
21 21 A. I just signed this. Where is my name?
22 22 Yeah.
23 23 Q. Okay.
24 24 A. I didn't see all that on it.
25 25 Q. And did you sign it on or about August

Bradshaw, Leon 12.1.09 video depo

1 00120:01 13th, 2008?
2 02 A. See this? That ain't me. I don't know.
3 03 That's not me.
4 04 Q. When you say that's not me, you didn't
5 05 write --
6 06 A. This is me.
7 07 Q. I'm asking you --
8 08 A. The dates. I don't know what date it was.
9 09 I don't know.
10 10 Q. Okay.
11 11 A. But if that's the date, yes, that's the
12 12 date.
13 13 Q. And did it have, at the top, "Power of
14 14 Attorney" on it?
15 15 A. Oh, man. Not that I know, nah. Like I'm
16 16 telling you and like I'm saying to you, anything
17 17 power of attorney and all that stuff, I wouldn't be
18 18 here now. I wouldn't --
19 19 Q. When you say you wouldn't be here, what do
20 20 you mean?
21 21 A. Any of this stuff here, any of these
22 22 documents you got, if you had power of attorney and
23 23 I had seen it or if I had known anything of power of
24 24 attorney, we wouldn't be in this -- you would have
25 25 had that money and I wouldn't be here now.

Bradshaw, Leon 12.1.09 video depo

1 00121:01 Q. When you say we would have had that money,
2 02 what do you mean?
3 03 A. Well, what am I saying is the \$6,000 that
4 04 I got, I wouldn't have taken it is what I'm saying.
5 05 Q. Do you --
6 06 A. I wouldn't have taken the money and I
7 07 wouldn't have been here.
8 08 Q. Do you understand that power of attorney
9 09 is somebody getting control of your life?
10 10 A. Well, that's what -- that's what -- to me
11 11 power of attorney, that's what it sounds like to me.
12 12 Q. But do you understand that there are more
13 13 limited powers of attorney --
14 14 A. I don't know.
15 15 Q. -- just to trade an account?
16 16 MR. VILKER: Objection.
17 17 A. I don't know trading accounts or whatever,
18 18 trading of anything. Any power of attorney over me
19 19 is zero. I don't care what -- you can cut it down
20 20 any way you want it and divide it any way you want
21 21 to divide it. Just the word power of attorney is
22 22 not for me.
23 23 Q. All right. But you don't deny that this
24 24 -- the words power of attorney were on the document
25 25 --

Bradshaw, Leon 12.1.09 video depo

1 00122:01 A. I don't know if it was on there.
2 02 Q. -- when you signed it?
3 03 A. I have no idea whether it was on there. I
4 04 didn't see it.
5 05 Q. Okay.
6 06 A. So I don't know if it was on there or not,
7 07 okay? I can't say it was on there, I can't say it
8 08 wasn't on there because I -- well, let me put it
9 09 this way, I didn't see it. Let me put it that way.
10 10 That's the only way I can answer that.
11 11 Q. Did you have any objection to allowing
12 12 Raymour to use your name in terms of trading on an
13 13 account?
14 14 A. I have objections of anybody using my name
15 15 to do anything.
16 16 Q. All right.
17 17 A. Anything.
18 18 Q. But you would -- you were willing to have
19 19 your name signed on these documents?
20 20 A. No, no, no.
21 21 Q. Yeah, you were.
22 22 A. Well, yeah, according to what you're
23 23 saying, yeah. Yeah, I can see that, yeah, because I
24 24 signed them.
25 25 Q. Right.

Bradshaw, Leon 12.1.09 video depo

1 00123:01 A. I can understand that. But if I'd known
2 02 what you're presenting to me now, no, my name
3 03 wouldn't have been on there.
4 04 Q. Okay. Did you have conversations with
5 05 Raymour --
6 06 A. And even though -- let me put it to you
7 07 this way now that you're coming to me like that. If
8 08 my name -- let's just say I agreed to put my name on
9 09 there, it wouldn't have been \$6,000, it would have
10 10 been \$60,000.
11 11 Q. You would have asked for more?
12 12 A. All right? Yeah. If you want to play
13 13 money games --
14 14 Q. But you were willing --
15 15 A. -- or how much did I want money, all
16 16 right?
17 17 Q. But you were willing to have your name
18 18 used for money?
19 19 A. No.
20 20 Q. Oh. Just you would have charged more?
21 21 A. No, no. If I -- if I -- if I had known
22 22 about power of attorney and all this crap, it would
23 23 have never been on there.
24 24 Q. I thought you told us it would have cost
25 25 them 60,000 instead of 6,000?

Bradshaw, Leon 12.1.09 video depo

1 00124:01 A. No. I said if, if I was into it and I had
2 02 wanted to do that, I would have charged you \$60,000.
3 03 That's what I said. We can play with words all you
4 04 want --
5 05 Q. Isn't it --
6 06 A. -- you know.
7 07 Q. Isn't it the case though that once you
8 08 heard that you stood a chance to make some money
9 09 here, you were willing to sign whatever documents
10 10 Raymour put in front of you?
11 11 A. Not make some money. See, we can play
12 12 with words. We can play with words all you want to.
13 13 Q. Get some money?
14 14 A. No, no, no, no. No, no. This thing
15 15 starts off with somebody giving money to somebody
16 16 that can use money, all right, of a good deed. Not
17 17 nobody making money, nobody trying to make money,
18 18 give it away. No, these are terms.
19 19 Q. Right. But then he came back to you with
20 20 another program --
21 21 A. Another program, somebody giving some
22 22 money away, sure.
23 23 Q. And you were willing to sign the documents
24 24 to get the money for this other program?
25 25 A. Well, I gotta sign something.

Bradshaw, Leon 12.1.09 video depo

1 00125:01 Q. Yeah, and you did?
2 02 A. Yeah. But I don't know -- you don't tell
3 03 me nothing about all this. I'm not even sure it was
4 04 on there, okay, you know, since -- since -- since
5 05 you wanna put it that way because I -- because --
6 06 because I didn't see it.
7 07 Q. You didn't care what was on there, you
8 08 were willing to sign whatever he was putting in
9 09 front of you?
10 10 A. You're telling me that I don't care about
11 11 my power of attorney? Are you kidding?
12 12 Q. Well --
13 13 A. You think I'm that stupid?
14 14 Q. I don't if you do or you're not, but you
15 15 did sign a power of attorney.
16 16 A. For six lousy thousand dollar -- thousand
17 17 dollars? That's what I'm saying. I would have
18 18 charged you 60. That's what I'm saying to you.
19 19 Q. But you're -- you're assuming --
20 20 A. This here.
21 21 Q. -- that the power of attorney is control
22 22 over your life, right?
23 23 A. It don't make no difference what it's
24 24 controlled over. Power of attorney is power of
25 25 attorney. You got some control over me in some

Bradshaw, Leon 12.1.09 video depo

1 00126:01 phase or some -- some -- some -- some denomination
2 02 or whatever, all right?
3 03 Q. Do you -- do you deny that the words power
4 04 of attorney were on this document when you signed
5 05 it?
6 06 A. I can't deny it. I didn't know -- I
7 07 didn't see it.
8 08 Q. Okay.
9 09 A. I didn't see it.
10 10 Q. All you saw was the \$4,000 --
11 11 A. I did not --
12 12 Q. -- and you've got a blind spot for
13 13 everything else?
14 14 A. That's right. You put 4,000 here,
15 15 blinders.
16 16 Q. Suddenly I disappear and everybody else?
17 17 A. Everybody else.
18 18 Q. You grab the money and you're out of here?
19 19 A. I'm gone, that's right, unless you show me
20 20 a power of attorney and then I give you the \$4,000
21 21 back.
22 22 Q. And then you want that \$60,000, right?
23 23 A. Yeah. Now, you put \$60,000, now we can --
24 24 Q. Now we're talking power of attorney?
25 25 A. Right, yeah. I'm just being honest with

Bradshaw, Leon 12.1.09 video depo

00127:01 you, man. I don't remember seeing that.
 02 Q. All right.
 03 A. I really don't.
 04 MR. FLANDERS: Thank you.
 05 THE WITNESS: You're a nice guy. Thank
 06 you, man.
 07 MR. MacFADYEN: John MacFadyen [REDACTED]
 08 [REDACTED] For the reasons that I previously stated,
 09 I have no questions at this deposition.
 10 MR. TRAINI: Anthony Traini [REDACTED]
 11 [REDACTED] I adopt Mr. MacFadyen's statement,
 12 and for all the reasons that he has stated at the
 13 previous depositions, I also have no questions at
 14 this deposition.
 15 MR. VILKER: Okay. The Government has no
 16 further questions. I believe this deposition is
 17 completed.
 18 THE VIDEOGRAPHER: Stand by, folks. The
 19 time is now 3:00 p.m. This is the end of tape one,
 20 the conclusion of the deposition. We are now off the
 21 record.
 22 (Whereupon, the deposition was concluded at
 23 3:00 p.m.)
 24
 25

C E R T I F I C A T E

00128:01
 02
 03 I, Diane J. DeStefano, a Notary Public, do
 04 hereby certify that I am expressly approved as a
 05 person qualified and authorized to take depositions
 06 pursuant to Rules of Civil Procedure of the Superior
 07 Court of Rhode Island, especially, but without
 08 restriction thereto, under Rule 30(e) of said Rules;
 09 that the witness was first sworn by me; the
 10 transcript contains a true record of the
 11 proceedings; that a review of the transcript by the
 12 witness was not requested.
 13
 14

15 IN WITNESS WHEREOF, I have hereunto set my hand
 16 this _____ day of _____, 2009.
 17
 18

19 _____
 20 DIANE J. DESTEFANO, RPR, NOTARY PUBLIC
 21
 22
 23
 24
 25